

IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT, IN AND  
FOR LEON COUNTY, FLORIDA.

CASE NO. 17CF00526

STATE OF FLORIDA,

vs.

Darrel D. Harvey,  
Defendant(s).

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MOTION IN LIMINE

The State of Florida, by and through the undersigned Assistant State Attorney, files this Motion in Limine pursuant to §90.402 and §90.403, Florida Statutes, and requests this Honorable Court to prohibit any and all argument, testimony or evidence of any relationship that exists between the Defendant's wife, Elizabeth "Blaise" Harvey and Chad Hoffman, Florida Department of Law Enforcement (FDLE) Agent. In support thereof, the State would allege as follows:

1. The Defendant was arrested for the charged crimes on February 12, 2017 as a result of a joint, undercover, law enforcement investigation entitled "Operation Cupid's Arrow."
2. In January of 2018, counsel for the Defendant notified the State that Agent Hoffman was in a dating relationship with the Defendant's wife, Ms. Harvey.
3. The State reached out to both Agent Hoffman and Ms. Harvey to investigate this claim.
4. Both Ms. Harvey and Agent Hoffman indicated they started corresponding via the social networking application Instagram back in October of 2017. They did not meet in person until January of 2018. They began dating sometime after they met in person. Any contact between the two began eight (8) months *after* the Defendant's arrest.
5. Agent Hoffman is not assigned to the Cybercrimes Unit of FDLE and had absolutely no involvement whatsoever with this case, the arrest of the Defendant, or Operation Cupid's Arrow. Agent Hoffman is not a witness in the State's case in chief.
6. Nor is Ms. Harvey a witness for the State.
7. Allowing the Defense to introduce any evidence of this relationship would be highly irrelevant to this case as it would not serve to prove or disprove any material fact. § 90.402, Fla. Stat.
8. Further, any probative value of this evidence would be substantially outweighed by the danger

of unfair prejudice to the State, or confusing the issues and misleading the jury. § 90.403, Fla. Stat.

WHEREFORE, the State prays this Honorable Court will grant the State's Motion in Limine and exclude any evidence of a relationship between Agent Hoffman and Ms. Harvey.

Respectfully submitted,

JACK CAMPBELL  
STATE ATTORNEY

/s/Emily Frazier  
Assistant State Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion has been furnished by e-service to Frank E. Sheffield, fsheffield@broadandcassel.com March 16, 2018.

/s/Emily Frazier  
Assistant State Attorney