

IN THE COUNTY COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
VOLUSIA COUNTY, FLORIDA

STATE OF FLORIDA,

v.

CHRISTINA G MARCH,
Defendant.

CASE NO.: 2019 310657 MMDB
JUDGE BELLE SCHUMANN

MOTION FOR STATEMENT OF PARTICULARS

COMES NOW the Defendant, Christina G March, by and through the undersigned attorney, and pursuant to Rule 3.140(n), F.R.Cr.P., and moves this Court to enter an order that the State provide to the Defense a more particularized and detailed statement of the allegations asserted against the Defendant, and as grounds would offer the following:

1. Christina March has been charged with Stalking Cayla Gayle Bartolucci contrary to Florida Statute 784.048(2).
2. To prove the crime of Stalking the State must show a course of conduct.
3. The Information filed by the State says that the crime occurred on or about June 14, 2019. The Charging Affidavit mentions that the harassment has occurred since January 3, 2019. The Charging Affidavit also references three instances of harassment but does not specify a date for those allegations.
4. To properly prepare a defense to this charge Ms. March needs to not only know the specific allegations that make up this course of conduct, but also what dates these occurred on. Without having a detailed statement of the allegations the Defense will not be able to investigate possible alibis or other defenses to this charge.

WHEREFORE Defendant respectfully requests this Honorable Court enter its order for the State to provide the Defendant a Statement of Particulars.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by delivery to:
Daytona State Attorney Office, Assistant State Attorney, 251 North Ridgewood Avenue,
Daytona Beach, FL 32114, and to the defendant, on September 27, 2019.

/s/ Angela Lowrey _____
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