

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

CASE NO. 2019 310657

STATE OF FLORIDA

VS.

CHRISTINA MARCH,
DEFENDANT.

_____ /

**STATE'S RESPONSE TO DEFENSE'S MOTION FOR STATEMENT OF
PARTICULARS**

The State of Florida, by and through the undersigned Assistant State Attorney, pursuant to Rule 3.140((n), Florida Rules of Criminal Procedure, provides a more particularized and detailed statement of the allegations asserted against Defendant.

1. On January 3rd 2019, the defendant made a social media post "tagging" the victim's place of employment, and referencing the victim's employment position.
2. On January 3rd 2019, the defendant posted on social media indicating that the victim violated public trust law.
3. On January 14th, 2019, the defendant made statements in reference to the victim's home state of Texas on social media.
4. On January 14th 2019, the defendant posted on social media attacking the victim's educational background.
5. On or about January 14th 2019, the defendant posted on social media referencing the victim's "tears."
6. On January 15th 2019, the defendant posted on social media attacking the victims employment position and referencing the victims home state.
7. On January 16th 2019, the defendant made reference to the victims "inherited property" on social media.
8. On January 17th 2019, the defendant posted on social media, "tagging" the victims place of employment and referencing the victim's job description.

9. On or about January 23rd 2019, the defendant made statements on social media attacking the victim's character.
10. On or about January 23rd 2019, the defendant made statements attacking the victim's employment position on social media.
11. On or about January 23rd 2019, the defendant made statements on social media attacking the victim's intelligence and "tagging" the victim's place of employment.
12. On or about January 23rd 2019, the defendant made statements on social media attacking the victim's marriage.
13. On or about January 23rd 2019, the defendant made a social media post about the victim attacking her job capabilities and calling her a derogatory name.
14. On or about January 23rd 2019, the defendant made statements on social media attacking the victim's credibility and employment position.
15. On or about January 23rd 2019, the defendant made statements on social media calling her derogatory names and again "tagging" her place of employment.
16. On or about January 24th 2019, the defendant made multiple posts attacking the victim's employment position.
17. On or about January 29th-January 30th 2019, the defendant "reposted" a social media post from the victim's private account from 2011.
18. On January 28th 2019, the defendant posted the victim's place of employment, work address, and work telephone number to the defendant's social media account.
19. On January 28th 2019, the defendant posted a screenshot of the victim's personal LinkedIn account to the defendant's social media.
20. On January 29th 2019, the defendant started a hashtag on social media to attempt to get the victim fired from her employment position. Multiple posts were shared.
21. On January 29th 2019, the defendant posted about the victim on social media attacking her appearance, credibility, and employment position.
22. On or about March 12th 2019, the defendant "tagged" the victim's place of employment on social media encouraging them to fire the victim.

23. On or about March 19th 2019, the defendant started a hashtag using the victim's name.
24. On April 1st 2019, the defendant filed a complaint with the City of New Smyrna Beach, alleging that the victim, was accessing information without a legal basis.
25. On April 4th 2019, an investigation into the victim was conducted by FDLE based on a complaint made by the defendant that the victim was accessing information without a legal basis. This complaint was determined to be unfounded by the New Smyrna Beach Police Department (NSBPD).
26. On April 8th 2019, the victim made a complaint to the Human Resources Department at New Smyrna Beach Police Department that she felt harassed and unsafe due to the actions of the defendant.
27. On June 10th 2019, the defendant referenced the victim's employment and the victim's husband's place of employment on social media. The defendant attacked the victim's work, appearance, and credibility. The defendant posted a picture with the victim present in one of the photos.
28. On June 11th 2019, the defendant was using a map of the victim's home as her "cover photo" on social media. Also on June 11th the Defendant posted about the victim's place of employment and employment position.
29. On June 14th 2019, the defendant referenced the victim's husband and his place of employment on a social media post. The victim's place of employment was "tagged."
30. On June 14th 2019, the defendant made a social media post referencing the victim's home state and city.
31. On June 14th 2019, the defendant posted a screenshot to social media of a map of where the victim and the victim's husband live.
32. On June 30th 2019, the defendant posted on social media attacking the victim, calling her derogatory names, and "tagging" her place of employment.
33. On July 5th 2019, the victim saw multiple Twitter posts made by the defendant referencing the victim, the victim's place of employment, and again the victim's home state.
34. On July 8th 2019, the defendant posted a photo with the exact view that would be captured if somebody where to take a photo standing directly in front of the victim's home.
35. On or about August 16th- 20th 2019, the defendant sent a complaint about the victim to the chief of police, mayor, and city manager of New Smyrna Beach and then proceeded to share it on her social media accounts.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been provided to ANGELA LOWREY, 251 NORTH RIDGEWOOD AVENUE, DAYTONA BEACH FLORIDA 32114 this ____ day of NOVEMBER, 2019

s/SHANNON SHONTZ-PHILLIPS
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