

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

CASE NO. 2016 306510 MMDB

STATE OF FLORIDA,

v.

RICHARD JAMES THRIPP,

Defendant.

Judge Schumann
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DEMAND FOR DISCOVERY

The defendant demands discovery, pursuant to the applicable provisions of the Florida Rules of Criminal Procedure, and further demands to be able to inspect, copy, test, and photograph the information and materials within the state's possession or control:


1. The statement of any person(s) known to the prosecutor to have information which may be relevant to the offense charged, and to any defense with respect thereto.
2. Any written or recorded statements and the substance of any oral statements made by the accused, including a copy of any statements contained in police reports or report summaries, together with the name and address of each witness to the statements.
3. Any tangible papers or objects which were obtained from or belong to the accused.
4. Whether the state has any material information which has been provided by an anonymous tipster.
5. Whether there has been any electronic surveillance, including wiretapping, of the premises of the accused, or of conversations to which the accused was a party, and documents relating thereto.
6. Whether there has been any search and seizure, and, documents relating thereto.
7. Reports or statements of experts made in connection with the particular case, including results of physical or mental examinations and of scientific tests, experiments, or comparisons.

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FLORIDA
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8. Any tangible papers or objects which the prosecuting attorney intends to use in the hearing or trial and which were not obtained from or belong to the accused.
9. It is further demanded that the prosecutor shall disclose to the defendant any material information within the state's possession or control which tends to negate the guilt of the accused as to the offense charged.
10. Pursuant to *Brady v. Maryland* (373 U.S. 83, 1963), it is further demanded that the prosecutor shall disclose to the defendant whether any law enforcement official(s) involved in this case, including, but not limited to, **VCSO Investigating Officer Richard Graves, Sgt. Gregory Miles, Dep. Krislie Shamburg, Dep. Timothy Wheeler, Dep. James Seyboldt, or Dep. Marth Adamczyk**, have been subjects of sworn complaints; internal review, or sanctions due to knowingly lying in an official capacity; providing false or misleading statements, affidavits, or sworn testimony; concealing, withholding, tampering with, or planting evidence; tampering with witnesses; or any other misconduct. The defendant hereby notes that Investigating Officer Richard Graves' sworn Charging Affidavit, dated 7 January 2015, claims that the subject of the alleged wellness check "only answered in one word responses," in contradiction of video evidence in the state's possession where the subject of the alleged wellness check can be clearly heard answering in whole sentences and being responded to by the alleged law enforcement officers that these cogent and lengthy responses were insufficient.
11. Any copies of transcripts or tapes of any and all radio or video transmissions made on the date involving this alleged crime in connection with this cause, together with the name and address of the custodian of said transcripts or tapes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery to the State Attorney's Office, at eservicedelivery@sao7.org, this 19th day of September 2016.



Richard James Thrupp
1829 Nelson Ave.
Ormond Beach, FL 32174
Defendant

FLORIDA JURAT
FS 117.05

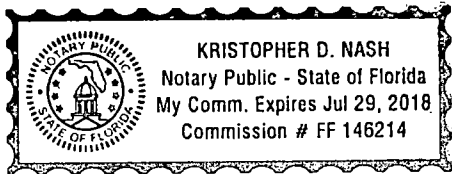
State of Florida }
County of VOLUSIA }

Sworn to (or affirmed) and subscribed before
me this 19th day of
Day

SEPTEMBER, 2016
Month Year

by RICHARD J. THripp
Name of Person Swearing or Affirming

Kristopher D. Nash
Signature of Notary Public — State of Florida



Place Notary Seal Stamp Above

KRISTOPHER D. NASH
Name of Notary Typed, Printed or Stamped

- Personally Known
- Produced Identification

Type of Identification Produced _____

FLORIDA DRIVER'S LICENSE

OPTIONAL

Though the information in this section is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

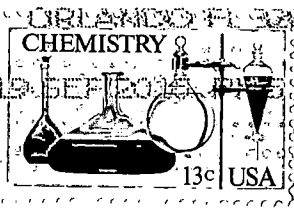
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Title or Type of Document: DEMAND FOR DISCOVERY 2016 306510 MMDB

Document Date: SEPTEMBER 19th, 2016 Number of Pages: 2

Signer(s) Other Than Named Above: N/A

RICHARD THRIPP
1829 NELSON AVE
ORMOND BEACH FL 32174



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Judge Belle B. Schumann
Division 83

125 East Orange Avenue

Daytona Beach, Florida 32114

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