

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR MANATEE COUNTY, STATE OF FLORIDA

STATE OF FLORIDA

CASE NO. 2020CF003014AX

VS

ASHLEY CHRISTINA BENEFIELD /

STATE'S SUPPLEMENTAL DISCOVERY EXHIBIT AND WITNESS LIST

THE STATE OF FLORIDA, by the undersigned, pursuant to Defendant's Notice of Discovery pursuant to Rule 3.220 Fla. R. Crim. P., submits the following information:

1. Names and addresses of persons with information relevant to any offense charged or to any similar fact evidence to be presented at trial under Section 90.404(2), Florida Statutes: 3.220(b)(1)(A)

Category A Witnesses: 3.220(b)(1)(A)(i)

MANATEE COUNTY SHERIFF'S OFFICE

Sgt. Brian Quiles #11000820 (EXPERT WITNESS)

Det. Jeremy Liddell #11009014

Det. Steve Ives #11003323 (EXPERT WITNESS)

Det. Chris Gillum #11000723

Det. Brian Moreland #11003020

Dep. Imran Din #11001610

Dep. Tyler Ackerman #11007208

Dep. Shayne Rousseau #11001713

Dep. Tyler Williford #1600227

Dep. Thomas Baurle #11008322

Dep. Shaun Ram #16000285

CST Nandi Martin #16000292

CST Deanna Groves #16000146

CST Abby Morrissey #11001506

CST William Rudolph #11009120

CST Meghan Dvorack #11003411

CST Amanda Conlon #11001220

Dr. Brad Broeder

1266 1st Street Apt. 11

Sarasota, FL

Dr. Barbara Russell

9114 58th Dr. East #110

Bradenton, FL 34209

Dr. Jason Quintal

9050 58th Drive E

Bradenton, FL 34202

Dr. Sharon Forrest

1990 Main St. #750

Sarasota, FL 34236

Stephanie Murphy
2127 Ringling Blvd. Suite 102
Sarasota, FL 34237

Faith Brown
1001 3rd Ave W
Bradenton, FL 34205

Kimberly Kuhn
1800 S. Pinellas Ave
Tarpon Springs, FL 34689

Amy Carlton
Herbert Carlton
4918 Newport News Cir
Bradenton, FL 34211

Category C Witnesses: 3.220(b)(1)(A)(iii)

MANATEE COUNTY SHERIFF'S OFFICE

Lt. Matthew Bertrand #11001515
Sgt. Aaron Bowling #11006413
Dep. James McDermott Jr. #11001109
Dep. Andrew Kish #11002606
Dep. Vincent Bowman #16000215

Emily Freck -property
Renee Kaczmarek - property
Amanda Russo - property
Danyal Brooks - property
Angela Gregory - property
Kathleen Tucker - property
Eric Laschke -fingerprint examiner

Dr. Brian James (pronounced victim)
Doctor's Hospital

Jennifer Locher
Apt Mgr Green Apts
11645 Monument Dr
Bradenton, FL 34211

Keaton Thomas (Ex-husband)

2. Written verbatim witness statements including police reports: 3.220(b)(1)(B)

- | | |
|--|--|
| ☒ PCA | ☐ UTC |
| ☐ VICTIM/WITNESS AFFIDAVIT(S) | ☒ OFFENSE/INCIDENT REPORT(S) |
| ☒ PROPERTY/EVIDENCE RECEIPTS | ☒ SUPPLEMENTAL REPORT(S) |
| ☐ CONTINUATION REPORT | ☐ CRASH REPORT |
| ☒ ARREST WARRANT & AFFIDAVIT(S) | ☐ INVENTORY REPORT |
| ☒ SEARCH WARRANT & AFFIDAVIT(S) | ☒ INVESTIGATION REPORT |
| ☐ RECORDED STATEMENTS OF: Amy & Herbert Carton, Dr. Barbara Russell, Dr. Jason Quintal, John Sant, Alicia Byers (3) | |
| ☒ OTHER: Reports from MSO# 2017-34105 Court Paperwork from Manatee County cases 2020DR1601, 2018DR1823, 2018DR2318 | |

South Carolina Court paperwork #2017 DR 10-3952
Victim's last will and testament
Barbara Russell Report, Dr. Brad Broeder's reports (2)
Various papers/documents/printout from victim's belongings
Various excerpts/document/emails/texts from victim's belongings (provided)
Various printed emails (see provided)
Disc-iCloud search warrant return
Disc-cell phone data Victim's phone
Disc-Court ruling by Judge Moreland in case #2018 DR 1823

3. Defendant's oral or written statements and names and addresses of all witnesses to statements: 3.220(b)(1)(C)

☐ N/A
☐ SEE ALL ITEMS IN #2 ☐ SEE ATTACHED SUBSTANCE OF STATEMENT
☐ TAPED STATEMENT OF DEF ☐ TRANSCRIPT OF DEF STATEMENT
☐ SUPP. RPT. FOR DEF STATEMENT(S) ☐ WAIVER OF CONSTITUTIONAL RIGHTS FORM
☒ OTHER: Reports from MSO# 2017-34105, Report and recorded statement of Dr. Barbara Russell, Dr. Brad Broeder's Report, Dr. Jason Quintal's recorded statement, Recorded statements (3) of Alicia Byers
Court Paperwork from Manatee County cases 2020DR1601, 2018DR1823, 2018DR2318
South Carolina Court paperwork #2017 DR 10-3952
Various papers/documents/printout from victim's belongings
Various excerpts/document/emails/texts from victim's belongings (provided)
Various printed emails (see provided)
Disc-iCloud search warrant return
Disc-cell phone data Victim's phone
Disc-Court ruling by Judge Moreland in case #2018 DR 1823

4. Co-defendant's oral or written statements in joint trial: 3.220(b)(1)(D)

☒ N/A
☐ SEE ALL ITEMS IN #2 ☐ SEE ATTACHED SUBSTANCE OF STATEMENT
☐ TAPED STATEMENT OF CO-DEF ☐ TRANSCRIPT OF CO-DEF STATEMENT
☐ SUPP. RPT. FOR CO-DEF STATEMENT(S) ☐ WAIVER OF CONSTITUTIONAL RIGHTS FORM
☐ OTHER:

5. Grand Jury testimony of the defendant: 3.220(b)(1)(E)

N/A

6. Tangible papers or objects obtained from or belonging to defendant: 3.220(b)(1)(F)

☐ N/A ☐ PARAPHERNALIA ☐ MARIJUANA
☐ TAPED STATEMENT ☐ COCAINE ☐ HEROIN
☐ PILLS ☐ METHAMPHETAMINE ☒ OTHER: See property
receipts/reports & search warrants/returns

7. Whether State has any material or information provided by a confidential informant: 3.220(b)(1)(G)
- ☒ N/A ☐ YES
8. Whether State has used electronic surveillance, including wiretapping, of the premises of defendant or of conversations to which defendant was a party and any documents relating thereto: 3.220(b)(1)(H)
- ☒ N/A
☐ YES ☐ AUDIO ☐ VIDEO
9. Whether there has been a search and seizure (with documents, if any): 3.220(b)(1)(I)
- ☐ N/A ☒ YES, SEE #6
10. Experts reports and statements: 3.220(b)(1)(J)
- ☐ N/A ☐ FINGERPRINT ANALYSIS
☐ LAB ANALYSIS ☐ MEDICAL RECORDS **
☒ OTHER: Dr. Brad Broeder, Dr. Sharron Forrest, Dr. Barbara Russell, Dr. Jason Quintal
Det Steve Ives and Sgt Brian Quiles - cell phone experts
- **DISCLOSURE CONTAINED IN THIS DISCOVERY CONTAINS INFORMATION COVERED UNDER THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPPA). YOU ARE ON OFFICIAL NOTICE THAT YOU ARE BOUND TO FOLLOW THE REGULATIONS OF HIPPA IN ANY DISCLOSURE OF THIS PRIVATE INFORMATION.**
11. Tangible papers and objects to be used at hearing or trial, not obtained from or belonging to defendant: 3.220(b)(1)(K)
- | | |
|--|---|
| ☒ SEE ALL ITEMS IN #2 THRU #10 | ☐ CDR |
| ☐ BANK RECORDS | ☐ CHECK(S) |
| ☐ CASE CARD | ☐ BOOKING REPORTS |
| ☐ FINGERPRINT CARD | ☐ FINGERPRINT ANALYSIS |
| ☐ MEDICAL RECORDS | ☐ EMS REPORT |
| ☒ LAB ANALYSIS pending | ☐ PHOTO LINE-UP/PHOTO PAK |
| ☒ AUDIO RECORDING(S) | ☒ PHOTOS |
| ☒ VIDEO RECORDING(S) | ☐ RECORD CUSTODIAN CERTIFICATION FORM |
| ☒ DEFENDANT'S CRIMINAL HISTORY | ☐ DEFENDANT'S BOOKING PHOTO |
| ☐ DEFENDANT'S CERTIFIED CONVICTION(S) | ☐ WITNESS'S CERTIFIED CONVICTION(S) |
| ☒ JAIL CALL(S) (UPON REQUEST FROM SAO) | ☒ 911 CALL(S) (UPON REQUEST FROM SAO) |
| ☒ EVENT CHRONOLOGY | |
| ☐ OTHER: | |
- See property reports/receipts & search warrant returns
Video of park
Ring Video
Scene Video
Scene Faro Scan
Court Paperwork from Manatee County cases 2020DR1601, 2018DR1823, 2018DR2318
South Carolina Court paperwork #2017 DR 10-3952
Various papers/documents/printout from victim's belongings
Various excerpts/document/emails/texts from victim's belongings (provided)
Various printed emails (see provided)

Disc-ICloud search warrant return
Disc-cell phone data Victim's phone
Disc-Court ruling by Judge Moreland in case #2018 DR 1823

12. Whether State has any tangible paper, objects or substances in the possession of law enforcement that could be tested for DNA: 3.220(b)(1)(L)

☐ N/A ☒ SEE ALL ITEMS IN #2 AND #6
☐ OTHER:

13. The prosecution ☐ has ☒ has no material information tending to negate the Defendant's guilt: 3.220(b)(4).

****Please contact the undersigned Assistant State Attorney to coordinate an appointment to view any evidence that is retained in Property/Evidence.**

THIS ACTS AS AUTHORIZATION FOR YOU TO HAVE THE APPROPRIATE AGENCY COPY ANY AND ALL AUDIO/VIDEO TAPES AND OR CDs/DVDs AND OR PHOTOS THAT MAY PERTAIN TO THIS CASE WHICH HAVE BEEN LISTED IN THIS RESPONSE. DO NOT COPY ANY MATERIALS THAT DEPICT A SEXUAL ASSAULT VICTIM AND/OR ARE PORNOGRAPHIC.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by E-mail/E-service to: Jennifer Sanchez, Office Of The Public Defender, 1051 Manatee Ave. West, 7Th Floor, Bradenton, FL 34205;
JENNIFER.SANCHEZ@MYMANATEE.ORG, ESERVEFELONYPD@MYMANATEE.ORG this 8th day of December, 2020.

**ED BRODSKY, STATE ATTORNEY
TWELFTH JUDICIAL CIRCUIT**



By:

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Assistant State Attorney
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Number of Pages Provided:
Guideline Scoresheet

****This program is required to extract any zipped supporting documents/media: <https://www.7-zip.org>**