

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT, OF THE STATE
OF FLORIDA, IN AND FOR MIAMI DADE COUNTY**

STATE OF FLORIDA,

CASE NO.: F23-021321

Plaintiff,

vs.

JUDGE: RICHARD HERSCH

DEREK ROSA,

Defendant.

SECTION: F013

DEREK ROSA'S RESPONSE TO COURT ORDER ISSUED ON JULY 10, 2025

COMES NOW Derek Rosa, by and through the undersigned counsel, and in response to the Order on Status Conference on July 10, 2025, an effort to comply with the Amended Case Management Order from June 18, 2025, and overall maintain a true and factual representation regarding the current state of this cause, submits the following.

1. Pursuant to the Florida Rule of Judicial Administration 2.545 and Florida Rule of Criminal Procedure 3.220(o), this Court entered an Amended Case Management Order on June 18, 2025. On July 10, 2025, this Court entered another Order on Status Conference on July 10, 2025, which further delineates the responsibilities of the parties in this litigation.

2. Under section one (1) of the Order on Status Conference on July 10, 2025, the

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Defense was ordered to provide legal memoranda and/or provisions on case law regarding trial Court request to access Pre-Trial Discovery.

A. At this juncture in the litigation, the Defense respectfully objects to any procedure whereby the Court would receive and review pretrial discovery—including depositions and witness statements—specially at the unilateral discretion of the State. This request is premature, as there are no evidentiary hearings currently scheduled, the trial schedule in place is not realistic, and this file does not involve overly complex or outrageous legal review. At this time, there is no compelling interest which would merit exposing the judiciary, to potentially inadmissible and prejudicial information, and further, the proposed request improperly delegates to the State the function of curating evidence for judicial consumption, outside the adversarial process. These actions are inconsistent with the constitutional guarantees of due process and impartial adjudication. For example, depositions are not per se evidence at trial or hearings unless properly admitted and subject to cross-examination under the rules of evidence. Depositions frequently contain hearsay, speculation, and untested assertions that are subject to objection. Judicial exposure to such materials outside of adversarial presentation risks tainting the Court's impartial fact-finding function. Florida law provides structured mechanisms by which a judge becomes familiar with the case: through litigated motions, stipulations, evidentiary hearings, and trial proceedings. See Fla. R. Crim. P. 3.190; *Petion v. State*, 48 So. 3d 726, 729–30 (Fla. 2010). It is a fundamental principle that “[a] fair trial in a fair tribunal is a basic requirement of due process.” *In re Murchison*, 349 U.S. 133, 136 (1955). Florida courts have likewise emphasized that judges must remain neutral arbiters and

must avoid conduct that would "create an appearance of partiality." *State ex rel. Mickle v. Rowe*, 100 So. 2d 124, 128 (Fla. 1958); *Chastine v. Broome*, 629 So. 2d 293, 295 (Fla. 4th DCA 1993).

In fact, on January 2 of this year, in this very same case, the Third District Court of Appeals expressed that "with very few exceptions, the Court's role does not include initiating matters but instead is limited to adjudicating matters properly raised by interested parties". See *Rosa v. State* (Fla. 3d DCA 2025). In the same opinion, the Court cited to *H.L.D., Jr. v. State*, 83 So.3d 750, 753 (Fla. 5th DCA 2011) ("[A Judge may not independently investigate facts outside the presence of the parties except when expressly authorized by law to do so.>").

2. Under section two (2), of the Order on Status Conference on July 10, 2025, this Honorable Court orders the Defense to provide legal memoranda and/or provisions on case law and necessity of a Protective Order regarding the photographs of the crime scene and/or victim and the Court's jurisdiction to do so.

A. As this Honorable Court is aware, on or about Mother's Day, 2025, there were photos, and one eleven (11) second video depicting Irina's Garcia expired body, while being handled by police and medical examiner's personnel, that were shared via email by members of the public with this Court, Defense, and State Attorney's Office. It is important to note, that not only were these photos shared with all of us by the public, but they have also illegally and reprehensively been floating on the web for an

unknown period of time, and to date, it is impossible to tell how many individuals have in fact seen these photos.

During our Status conference on May 15, 2025, while in rightful utter shock, this Court reasonably inquired if any party had information regarding these photos and how they ended up in our inboxes. The Defense at that time made an *ore tenus* request for it to be incumbent upon both parties, not just the Defense, to try and find out who was responsible for this leak. As a response, this Court later issued an Order (Docket Entry 519), denying the Defense's request, and instructing the parties to see *State v. Donner*, 500 So. 2d 532 (Fla. 1987); *Wade v. State*, 41 So. 3d 851 (Fla. 2010) ("It is not the Court's role to direct a party as to how to litigate). It is important to note, the Defense, prior to the public sending these items via email, and prior to June 12, 2025, **did not** have these photos, or video.

In undersigned's almost fifteen years of practice, and having handled other highly publicized cases not just in Florida, but nationwide, undersigned has never been part of a case where photos, and video of the decedent's body floated on the web. This situation brings about due process concerns for the impartiality of Derek Rosa's criminal proceedings, and the compromised otherwise, fundamental right to a fair and impartial trial that should be afforded to this Minor.

Additionally, public access to these photos raises serious concerns about: 1. the intentionality of the individuals, or organization behind the leak, 2. the duty of care, and accountability that all those in possession of these photos should have adhered to prior to unlawful, or grossly negligent dissemination, 3. The lack of respect for the

honor, privacy rights, and overall human decency and dignity to Irina Garcia's body. To say the least, this repulsive situation is an embarrassment and complete disgrace to our system, and an outright desecration of Irina Garcia's body.

As undersigned advised the Court on July 10, 2025, these photos, and video that were leaked were not part of any Discovery provided in this case prior to June 12, 2025. As was also explained to the Court on July 10, undersigned learned that the photos in question were taken, and also shared via WhatsApp Chat by a Hialeah police Department Detective. On July 10, 2025 undersigned further asked the Court if it needed to know names, as undersigned was ready to provide the identity of the individuals involved.

This background is important as this Protective Order seeks to simply add an extra layer of protection which this case evidently merits, in addition the request is aligned with what Florida Law allows. All parties that would otherwise not be under this Court's jurisdiction, and should be prior to the entering of this proposed Order, have voluntarily submitted themselves to this Court's jurisdiction. Secondly, all parties that are relevant to the disposition of this Order seem to be in agreement. There is nothing in this Order that runs afoul Florida Law. Other than civil litigation as remedy, which is already underway by the appropriate parties that have the rightful standing, this is the only recourse for an added level of protection given all outrageous occurrences in this file, however, the Defense is always open to suggestions by the Court.

The Defense respectfully reminds this Honorable Court we flagged the necessity for this Protective Order since January of this year, and relies on the record speaking for itself on this topic. At this time, the Defense defers to the Court, and at the very least would be encouraging of the Court signing its proposed Order on May 22, 2025.

3. Under section three (3), of the Order on Status Conference on July 10, 2025, this Honorable Court directs the Defense that *if* Derek Rosa wishes to amend the previously filed Motion to Suppress Statements, that such amendment shall be in writing by July 15, 2025.

A. The Defense submits that the Motion to Suppress Derek Rosa's Statements was brought forth in good faith, and Defense stands by every allegation raised in that Motion. Since the filing, there was a Motion to Compel Defendant's Medical, Mental Health, Psychological, Social Work, and Educational Records. As a result of this Motion- especially given the overly broad nature of this request, and the inherently private and irrelevant information contained in some of the records, the Defense started evaluating, and in fact consulted with an appellate attorney on whether to withdraw the Autism, and ADHD reference in the Motion to Suppress. Since Derek Rosa, in fact suffers from diagnosed Autism, and ADHD, that was initially flagged and tested by correctional health service experts, *not* by anyone independently hired by the Defense, this evaluation to *possibly* amend the Motion to Suppress, to reflect withdrawal of those references, would come *solely* as a strategic decision. However, at this time it is the Defense's position that we can't substantively address the Motion to Suppress, nor the Motion to Compel stemming from the same, because they truly

fall under restructuring of the Case Management and scheduling in this case. Therefore, we ask the Court to hold ruling, until we actually set the matter for a hearing, or have a realistic trial schedule on this matter.

The Defense further submits that the Motion to Suppress Statements was not brought forth because of Autism and ADHD standing alone. This Motion would be presented in good faith, and it is our position should survive with or without referencing the diagnosed Autism or ADHD. When evaluating the voluntariness of Derek's statements to law enforcement, aside from diagnoses of Autism and ADHD, this Court has amongst other items, to consider this child's age, the time the interview took place, lack of father being present, lack of familiarity with the legal system, recent traumatic event the Minor had undergone¹, toxicology, surroundings and police presence in the room, etc. Therefore, it is our position, this Motion should survive with or without the Amendment, *if* in fact a strategic review suggests amendment as a course of action.

The Defense reminds this Honorable Court that during the December evidentiary hearing, Dr. Gina Bettica, an expert *not* hired by the Defense, but rather an employee of Correctional Health Services, testified to these conditions. Since, Defense expert witnesses have been retained, and revealed to the State of Florida in compliance with June 18, 2025 ACMO, however, the investigation process has not yet been completed, as such medical experts for the Defense have not generated any

¹ Irrespective of the theory regarding guilt or innocence anyone has on this case, this Minor was interviewed roughly four hours after arguably one of the most traumatic events in his life, he in fact was Baker acted at Jackson Crisis Center only hours *after* the police interview.

reports at this time. Accordingly, and for good cause shown, it is premature to force the Defense into making such a strategic decision. At this point, making this determination without all medical evaluations having been completed is early, and simply a prejudicial, non-necessity at this juncture.

The Defense respectfully reminds this Court, that alongside expediently carrying the criminal process along, the Defense has tirelessly attempted to secure the remand of Derek Rosa to the JCC. As part of that endeavor, and mostly due to the Minor's educational plan, several testing had to be performed by the School Board last year. Some of these tests require a six to eight month waiting period, otherwise, the results could be invalidated. For example, last psychoeducational evaluation by the School Board was late fall 2024. This means the Defense had a waiting period prior to testing Derek Rosa, and as such our investigation and preparation is not completed. Absent a showing of bad faith, which none exists here, the Court should not foreclose our investigation, which includes finishing all preparation necessary to put forth a defense to the case in chief. Additionally, as this Court is aware, there are Ex Parte matters that have not been completed.

4. Under section four (4), of the Order on Status Conference on July 10, 2025, this Honorable Court directs any objection to the Case Management Order or Motion for Continuance by either side shall be filed in writing alleging specific factual grounds, and citing

supporting case law by July 15, 2025. The Defense urges the Court to take a detailed look at Exhibit 1, attached below, for a more detailed breakdown of discovery progress in this case.

A. The last Case Management Order that was filed on June 18, 2025, in this case unfortunately does not set forth realistic expectations of this file. Under section II, subsection B.2. of the ACOMO, all depositions must be completed by August 1, 2025. State's DNA expert Toby Wolson was just listed on June 30, 2025, and his report was provided to the Defense on July 9, 2025. It is unrealistic for the Defense to have enough time to confer with the appropriate expert, and schedule the deposition of Mr. Wolson by August 1, 2025. Accordingly, and for good cause shown, Derek Rosa would seek leave of the Court for additional time to complete this Expert's deposition. It took the State of Florida between seven and fourteen months to submit digital discovery and reports in this case, and their third analyst, who anticipates preparing a PowerPoint in this case, due to what the State classifies as, "the voluminous nature of the cell phone evidence", has yet to turn that PowerPoint over. The Defense was alerted in February that this witness will be offering a report, and a PowerPoint for Trial, to date this has not been provided and consequently this witness has not been deposed. The continuation of Expert Salas' Deposition is also hinging on Cremisini's Deposition, and per Court's own suggestion during Status hearing on May 15, 2025, will take place *after* Expert Cremisini is deposed. Likewise, the State of Florida is also not done with their depositions, and will not be done by August 1, 2025.

It is unrealistic, unreasonable and highly prejudicial to expect the Defense Experts to conduct their investigation and prepare final opinions within days.

Accordingly, and for good cause shown, Derek Rosa would seek leave of the Court for additional time for all Defense Experts to formulate final opinions, complete depositions and file substantive motions.

It naturally follows deadlines to submit pre-trial motions should also be extended. Accordingly, and for good cause shown, Derek Rosa would seek leave of the Court for additional time to file pre-trial motions. The Defense finds it necessary to emphasize that it is unreasonable and highly prejudicial for the cause and effect from delays to be ignored. However, in spite of all setbacks and last minute productions, the Defense has consistently worked in a timely manner, but the Court cannot ignore the current state of the discovery process, and now impose this accelerated agenda. Doing so, only harm the Defense, since all things considered, it would follow, that he defense team has not had an opportunity to complete the full and necessary investigation of the charged allegations.

- B. The United States Supreme Court has held that indigent defendants must be afforded "[m]eaningful access" to the justice system, including "access to the raw materials integral to the building of an effective defense." *Ake v. Oklahoma*, 470 U.S. 68, 76-77, 105 S. Ct. 1087, 1093, 84 L.Ed.2d 83 (1985) (emphasis added). Due process therefore requires that, where the assistance of an expert will enhance "the potential accuracy of the jury's determination, and where the interests of the individual and the State in an accurate proceeding are substantial, the State's interest in its fisc must yield." *Id.* at 83; *see also Dingle v. State*, 654

So.2d 164 (Fla. 3d DCA 1995), *cert. denied*, 481 U.S. 1054, 107 S.Ct. 2192, 95 L.Ed.2d 847 (1987)), *review denied*, 662 So. 2d 933 (Fla.1995).

C. Representation of a minor, facing these charges and the preparation by an attorney, has been compared to representation in capital cases. Competent representation in a capital case requires *thorough* investigation of all potential mitigating evidence, including securing the assistance of necessary experts. See ABA GUIDELINES FOR THE APPOINTMENT AND PERFORMANCE OF COUNSEL IN DEATH PENALTY CASES, Guideline 11.4.1 (1989) (hereinafter “ABA Guidelines”). An attorney's failure or inability to investigate possible mitigation deprives the defendant of the effective assistance of counsel, in violation of the Sixth Amendment, often requiring reversal of the death sentence. *E.g.*, *Blanco v. Singletary*, 943 F.2d 1477, 1500 (11th Cir. 1991), *cert. denied*, 504 U.S. 943, 112 S.Ct. 2282, 119 L.Ed.2d 207 and 504 U.S. 946, 112 S.Ct. 2290, 119 L.Ed.2d 207 (1992); *Middleton v. Dugger*, 849 F.2d 491, 495 (11th Cir. 1988); *Armstrong v. Dugger*, 833 F.2d 1430, 1433 (11th Cir. 1987); *see also Blake v. Kemp*, 758 F.2d 523, 533 (11th Cir. 1985) (inability to obtain informed expert assistance in trial preparation presumptively precludes counsel from rendering effective assistance), *cert. denied*, 474 U.S. 998, 106 S.Ct. 374, 88 L.Ed.2d 367 (1985). Such reversals are enormously costly, due both to the length, complexity, and expense of the collateral proceedings and to the cost of conducting a new trial or resentencing proceeding many years after the crime. See Norman Lefstein, *Reform of Defense Representation in Capital Cases: The Indiana Experience and its Implications for the Nation*, 29 IND. L. REV. 495, 500, 509 (1996) (noting high reversal rate for

capital cases in federal court and emphasizing that better representation and expert assistance at original trial reduces chances of later reversal and additional expense of retrial).

- D. All things considered, the Defense complying with the June 18, 2025 ACMO in its entirety, would deprive Derek Rosa of his right to a well prepared and effective defense. At no point has Derek Rosa caused any issues, nor is he the source of any delay. Derek Rosa has no control over the progress and development of the outlined issues in discovery process, and other items in the natural flow of his case, therefore, he should not be penalized.
- E. The Defense has conferred with the State of Florida, and there would not be a prejudice to the State for this Honorable Court to set forth a more realistic schedule.
- F. This motion is made in good faith and not for purposes of delay, the defense team is committed to the zealous representation of Derek Rosa that above all ethically meet the standards of effective counsel. The Defense recognizes that this is an exceptional case and have worked it as such from the very beginning.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of Court, on this 14th day of July, 2025.

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EXHIBIT 1

Discovery Efforts (non-inclusive list) From November 7, 2023 through July 15 2025

Date / Docket Entry (D.E.)	Document Title / Request :	State's Response:	Important Notes:
11/7/2023 D.E. 34	-Demand for Discovery – Initial Discovery under Rule 3.220	-11/16/2023 Amended Discovery Exhibit -Arrest Affidavit (2 pages) -Search Warrant Residence (8 pages) -DNA Warrant (7 pages) -Cell Phone Warrant (10 pages) -750 Crime Scene Photos -30 witnesses	-The Defense made their initial discovery demand on November 7, 2023, discovery production was due by November 15, 2023. A day later, the State disclosed a two page arrest affidavit and two out of eleven warrants. The Second Search Warrant for the residence, was or should have been in the State's possession, as it was signed on October 19, 2023. The State also provided crime scene photos, however; there were over 100 photos that were supplemented as late as June 24, 2024. -Note: Warrants for the iCloud, iPads and the laptop were not signed until April 21, 2024 (six months later).
11/11/2023 D.E. 42	Motion to/for Emergency Access and Inspect Crime Scene	-State objected on November 22, 2023.	-Granted on November 29, 2023, Inspection Occurred promptly by Defense on November 30, 2023.
12/27/2023 D.E. 80	Motion to Compel Defendant's Unredacted 911 Call	Amended Discovery Exhibit 1-9-2024	-The original request from the Defense was on November 7, 2023. The State did not turn over the unredacted 911 call until January 9, 2024.
2/14/2024	Second Motion to Compel	Amended Discovery	

<p>D.E. 129</p>	<p>Items Requested:</p> <ol style="list-style-type: none"> 1. Phone records/ data/ extraction (Black iPhone with protective case; Det. F. Perez) 2. Boifun baby monitoring system extraction, SD memory card extraction, Kingston USB extraction. <hr/> <ol style="list-style-type: none"> 3. Photographs and videos of light colored pajama pants, and top Derek was allegedly wearing. <hr/> <ol style="list-style-type: none"> 4. Tangible papers or objects obtained from or belonging to the accused. 5. Any further documents stemming from/relating to the search and seizure in this cause. <hr/> <ol style="list-style-type: none"> 6. Reports and statements from experts made in connection with this case. <hr/> <ol style="list-style-type: none"> 7. Full extraction from Ring system. 	<p>Exhibit 2-16-2024</p> <p>Redacted A-Form 2-20-2024</p> <p>Amended Discovery Exhibit 3-11-2024</p> <p>NOTE: Order Granting Second Motion to Compel required items to be disclosed within 10 days (3/1).</p>	<ol style="list-style-type: none"> 1. Defendant's cell phone extraction as well as the iCloud Warrant results were not received until May 29, 2024. T-Mobile records were not received until August 6, 2024. 2. Extraction received 5/29/2024; stills received 6/24/2024 <hr/> <ol style="list-style-type: none"> 3. Non-existent. Lead Detective Joseph Elosegui's Supplemental Report was disclosed 5/30/2024, seven and a half months after the incident. <hr/> <ol style="list-style-type: none"> 4. Miranda Form signed by Defendant received 4/3/2024 5. Discord Warrant/Property Receipts received 4/19/2024; Search Warrants for teal iPad, gray iPad, blue iPad, laptop, iCloud received 4/29/2024; Icloud warrant, Phone Extraction/Blue and Gray iPad extraction/drive extraction received 5/29/2024; Discord received 8/21/2024 <hr/> <ol style="list-style-type: none"> 6. Expert witnesses Dr. Nicholas Barna, Michelle Andrade and Tangela Anderson were listed on 8/26/2024. USSS Agent Luis Salas was listed as Expert witness on September 5, 2024. 7. Four doorbell clips received 2/2/2024
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3/29/2024 D.E. 142	Defendant's Third Motion to Compel Discovery and Allow Inspection	Amended Discovery Exhibit 4-3-2024 (Note: this was sent to the Defense on the day of the hearing.)	
	Items Requested:		
	1. Exhibit and reports shown to C.G. during his interview by DeLima and Gonzalez.		1. Color printouts shown to C.G. during interview (6 pages) received 4/29/2024
	2. All reports or partial reports from any and all electronic devices.	Amended Discovery Exhibit 5-3-2024	2. Cell phone extraction available for copy at SAO 4/29/2024; iCloud warrant, Cell Phone Extraction/Blue and Gray iPad extraction/extraction/drive extraction received 5/29/2024; T-Mobile Records received 8/6/2024; Discord Records / Transactional records / Excel Spreadsheet / Business records certificate / user information received 8/21/2024
	3. All reports or partial reports from any and all communication platforms, including but not limited to: Discord, Google Chat, Slack, Whatsapp, iMessage, or any other communication platforms.	Amended Discovery Exhibit 5-6-2024	
	4. Any and all police reports, RAP sheet, Body Worn Camera.	Amended Discovery Exhibit 5-15-2024	3. Whatsapp Messages and iMessages via extraction report.
	5. 911 CAD Report		4. Please refer to chart from Nov 6, 2024 filing to see the "Status of Essential Witness Production", which catalogs all items received relating to listed officers, as well as all items still unknown or missing.
	6. Lists all items from Second Motion to Compel (see above on page three).		5. CAD Notes received 4/3/2024
			6. See above . on page three

<p>5/20/2024 D.E. 163</p>	<p>Motion to Compel Discovery Related to DNA Evidence</p>		<p>A ruling was not issued on this matter until August 1, 2024. The MDPD laboratory DNA file was not made available for inspection until August 12, 2024. The Defense picked it up two days later, on August 14, 2024.</p>
<p>5/29/2024 D.E. 171</p>	<p>Defense Amended Discovery Report</p> <p>“After reviewing the State’s Interim Discovery report dated May 29, 2024, the Defense requests an agreement be reached by this Friday May 31, 2024, and the evidence be turned over no later than Monday June 3, 2024.”</p> <p>Through this filing, the Defense demanded all reports and additional BWC, especially Detective Elosegui’s. The Defense had previously motioned this Court in their Second and Third Motions to Compel, to inspect, extract and copy all of the evidence in the possession of HPD.</p>		<p>Disclosure of officer reports and Body Worn Camera was received on: 4/29/2024; 5/3/2024; 5/6/2024; 5/7/2024; 5/8/2024; 5/14/2024; 5/15/2024; 5/23/2024; 5/28/2024; 5/30/2024; 8/21/2024; 8/22/2024; 9/4/2024; 9/5/2024; and 9/9/2024.</p> <p>Detective Elosegui’s supplement report was received on 5/30/2024.</p>
<p>7/26/2024 D.E. 212</p>	<p>Fourth Motion to Compel</p> <p>Items Requested:</p> <p>1. T-Mobile Records</p> <hr/> <p>2. Facebook Printouts</p> <hr/>		<p>1. T-Mobile Records were received on 8/6/2024.</p> <hr/> <p>2. The Facebook printouts were ordered to be provided during the deposition of Detective Elosegui. (Order from August 26, 2024).</p> <hr/>

<p>3. Specific Messages between Detective Elosegui and Frank Ramos</p>		<p>3. Messages between Detective Elosegui and Frank Ramos were received in part on 6/24/2024. The Defense believes that the screenshot received does not encompass all text messages between Detective Elosegui and Frank Ramos. If any other messages exist, the Court ordered the Detective to bring during his deposition (Order from August 26, 2024).</p>
<p>4. Text Messages between Detective Elosegui and Luis Verdecia.</p>		<p>4. The State notified all parties via Interim Discovery Report, that the text messages requested by the Defense were not exchanged until August 6, 2024. Messages between Detective Elosegui and Luis Verdecia were received by the Defense on 8/6/2024. The Defense subsequently requested that a better exhibit of the messages be provided as the original exhibit disclosed did not include dates or times of the text message exchange. It was ordered by the Court that Detective Elosegui bring the exchange with him at the time of his deposition (Order from August 26, 2024).</p>
<p>5. CCTV Footage from HPD Main Station</p>		<p>5. The State represented in open court that the footage requested was past the retention date. In response to a Public Records Request asking for the same CCTV, Hialeah Office of the City Clerk responded as follows: "pursuant to section 119.071(2)(d) and 119.071(3)(a) of the Florida Statutes, the records you are seeking are exempt from public disclosure, and, therefore, will not be released." On September 18, 2024 HPD further relayed directly to undersigned that the "record is no longer in existence".</p>

8/9/2024 D.E. 223	<p>Defense's Response to the State of Florida's Court Ordered Interim Discovery Report filed on August 7, 2024</p> <p>The Defense reiterated their requests for the Facebook Printouts, Text Messages Between Detective Elosegui and Luis Verdecia, Text Messages Between Detective Elosegui and Frank Ramos.</p> <p>The Defense also noted that the Motion to Compel Discovery Related to DNA Evidence was in fact filed on 5/20/2024, and not on July 31 2024. The DNA production has since been received on 8/12/2024.</p> <p>The Defense reiterated outstanding items from their Third Motion to Compel and Allow Inspection filed on 3/29/2024 and their request in both Second and Third Motions to Compel, to inspect all items.</p>		Please see above items 2, 3 and 4 regarding docket entry 212.
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Date / Docket Entry (D.E.)	Document Title / Request	Important Notes
8/13/2024 D.E. 222	Second Amended Notice of Taking Deposition	20 witnesses scheduled for 8/26/2024 through 9/17/2024
8/14/2024 D.E. 224	Amended Discovery Exhibit	CD from the MDPD laboratory was picked up by the Defense the same day it was made available by the State

<p>8/21/2024 D.E. 228</p>	<p>Third Amended Notice of Taking Deposition</p>	<p>Amended depositions scheduled through Second Amended Notice of Taking Deposition; 20 set 8/26/2024 through 9/17/2024</p>
<p>8/22/2024 D.E. 229</p>	<p>Amended Discovery Exhibit</p>	<p><u>8/22/24 Emailed to defense counsel.</u></p> <ul style="list-style-type: none"> -Body Worn Camera Footage Associated with X60A12549 14m6s Officer Lastra -Body Worn Camera Footage Associated with X60A11988 15m5s, 7m36s Officer Delgado -Body Worn Camera Footage Associated with X60A16508 11m50s Officer Gonzalez -Body Worn Camera Footage Associated with X60A12159 9m32s Sgt. Bendamio -Body Worn Camera Footage Associated with X60A16438 29m1s Officer Casinol Perez -Body Worn Camera Footage Associated with X60A16878 14m35s Officer Y. Gonzalez -Body Worn Camera Footage Associated with X60A12155 2m6s Officer Alonso Gonzalez <p><u>8/21/24 Emailed to defense counsel</u></p> <ul style="list-style-type: none"> -Discord Records -Transactional records Excel Spreadsheet - Business records certificate (1 page) -Defendant's user information (1 page) -Body Worn Camera Footage Associated with X60A16658 2h40m53s Officer Gutierrez

		<p>-Body Worn Camera Footage Associated with X60A19586 1h41m10s, 2h11m04s</p> <p>Officer Acosta</p>
<p>8/26/2024</p> <p>D.E. 237</p>	<p>Amended Discovery Exhibit</p>	<p><u>State Witnesses #31-58 listed:</u></p> <ol style="list-style-type: none"> 31. Dexter Tillmon (ID. 01422) 32. Richard Quintero (ID. 01249) 33. Manuel Moreno (ID. 02221) 34. Raul Fiallo Morell (ID. 02220) 35. Norvin Moya (ID. 02348) 36. Deymon Bordon (ID. 02180) 37. Boris Herrera Valdes (ID. 02403) 38. Yoan Rama (ID. 02425) 39. Lanyene Miranda (ID. 01588) 40. Nicole Mannarino (ID. 02373) 41. Destiny Rodriguez (ID. 02414) 42. L.L. Minor 43. J.M. Minor 44. K.V. Minor 45. R.M. Minor 46. E.P. Minor 47. Alberto Duque Jr. (ID. 01956) 48. Alexander Dorado (ID. 01082) 49. Dustin Hernandez (ID. 02079) 50. Guillermo Sevilla 51. C.G. Minor 52. Brianne Natareno (ID. 00263) 53. Kenneth Gutierrez (new address) 54. Robert Acosta (new address) 55. Dr. Nicholas Barna; Miami Dade Medical Examiner's Office 56. Frank Ramos 57. Michelle Andrade (ID. 08676) 58. Tangela Henderson (ID. 08448) <p>Note: It is important to note here that a significant number of key witnesses, including the victim's boyfriend and his work supervisor, the medical examiner that performed the autopsy, detectives involved in the investigation, crime scene technicians, and DNA personnel, were not listed until 8/26/2024, nearly a year after</p>

		<p>the incident. <u>In fact, 6 of the 12 proposed State trial witnesses came from this Amended Discovery Exhibit. Also important to note that only 5 witnesses from this list are left to be deposed as of today's date.</u></p>
<p>8/26/2024 D.E. 240</p>	<p>Order: On Discovery</p>	<p>The Facebook printouts will be made available to Defendant's counsel at the time of the deposition of Detective Elosegui. Should Defendant's counsel seek copies of said Facebook Printouts after the conclusion of the deposition, the matter shall be brought before the Court.</p> <p>All text messages between Detective Elosegui and Luis Verdecia will be made available to Defendant's counsel at the deposition of Detective Elosegui. Defendant's counsel may inquire if there are additional text messages other than those made available. Should an issue arise regarding the Elosegui/Verdecia text messages, it shall be brought before the Court.</p> <p>All text messages between Detective Elosegui and Frank Ramos will be made available to Defendant's counsel at the deposition of Detective Elosegui. Defendant's counsel may inquire if there are additional text messages other than those made available. Should an issue arise regarding the Elosegui/Ramos text messages, it shall be brought before the Court.</p> <p>The State represented that the Hialeah Police Department advised her the requested CCTV footage of the Hialeah Police Department Main Station is no longer in existence; accordingly, this Court will not order production of such footage. This Order shall not limit Defendant's</p>

		<p>efforts to obtain CCTV footage, if any, via public records request or appropriate proceedings, from the City of Hialeah.</p> <p>In order to perform a physical inspection of items of evidence held by the City of Hialeah Police Department, Defendant's counsel shall coordinate such inspection with the State. Should Defendant's counsel wish to perform a scientific, destructive or other such examination on any item(s) of evidence, that shall be done only by subsequent Court order.</p>
<p>9/5/2024 D.E. 248</p>	<p>Amended Discovery Exhibit</p>	<p><u>9/4/24 Emailed to defense counsel.</u></p> <ul style="list-style-type: none"> -Officer Dorado Supplemental Report (1 page) -Detective Mui's Supplemental Reports (30 pages) -Body Worn Camera Footage Associated with X60A1340C 11m11s, 13m29s Officer Bejar -Body Worn Camera Footage Associated with X60A16648 12m23s Officer Aramburo -Body Worn Camera Footage Associated with X60A19697 29m38s Officer Lahera <p>Note: Detective Mui is a key witness in this case, and is one of 12 anticipated State trial witnesses.</p>
<p>9/9/2024 D.E. 254</p>	<p>Amended Discovery Exhibit</p>	<p><u>9/9/24 Emailed to defense counsel.</u></p> <ul style="list-style-type: none"> -Body Worn Camera Footage Associated with X60A1611A 30m11s, 16m11s Officer Pereira Da Costa -Body Worn Camera Footage Associated

		<p>with X60A17386 6h32m53s Officer Moya</p> <p>-Body Worn Camera Footage Associated with X60A10929 26m45s Officer Herrera Valdes</p> <p>-Body Worn Camera Footage Associated with X60A15548 10m35s, 8m4s Officer Bordon</p> <p>-Body Worn Camera Footage Associated with X60A91125 13m24s Officer Marin</p> <p>-Body Worn Camera Footage Associated with X60A18867 40m44s Officer L. Hernandez</p> <p>-Body Worn Camera Footage Associated with X60A1463C 15m26s Officer Casamayor</p> <p><u>9/5/24 Emailed to defense counsel.</u></p> <p>-Body Worn Camera Footage Associated with X60A19928 25m30s Officer Zerbinatti</p>
9/20/2024 D.E. 257	Amended Discovery Exhibit	Images unrelated to 10/12/23 referred to in Det. Mui's supplemental report.
9/23/2024 D.E. 259	Amended Discovery Exhibit	Photos of Defendant provided by LL (A MINOR)
10/2/2024 D.E. 260	Notice of Taking Deposition	<p>20 witnesses scheduled for 10/10/2024 through 11/26/2024</p> <p>Note: Some of these witnesses had to be rescheduled due to hurricanes Helene and Milton. Important to note as of today's date, based on what we know, only 9 witnesses are left to be deposed.</p>
10/29/2024 D.E. 266	Amended Discovery Exhibit	<p>State Witness # 67 Detective Jose Romero (ID. 01963) listed.</p> <p>Note: Detective Romero was deposed on</p>

		12/18/24, less than 45 days after being listed. It is also very important to note that Detective Romero is 1 of the 12 anticipated State trial witnesses thus far.
11/11/2024 D.E. 268	Memorandum: Derek Rosa's Discovery Report	The Defense utilized this Memorandum as a way to emphasize the significant and exhaustive strides to keep the discovery process moving along in this matter. Defense counsel has continued to attempt to move this case forward in a timely and efficient manner, while not compromising with speed, the thoroughness and delicacy of the work product.
11/12/2024		Physical Inspection occurred at HPD. In spite the Court's order allowing for the visual inspection of all evidence, the Defense was not allowed to examine the alleged murder weapon, and a metal fragment. The kitchen knife (item 25) with purple handle was fastened inside a box with red plastic zip-ties. When the Defense requested this item to be taken out of the box, as were all other items examined that day, HPD objected, indicating that only a Defense's expert would be able to take the knife out of the box, or alternatively the Defense needed a specific Court Order. The ASA present at the viewing sided with HPD, stating "it is their evidence." The Defense explained that given the fact we were conducting an evidence viewing, wherein by right, Court Order and logic we are allowed to physically see the evidence, not being able to actually see the evidence in its entirety was in fact a direct barrier to the examination examination. Given HPD's erroneous posture, four days later, the Defense filed an Emergency motion to inspect those items, which the Court granted.

<p>11/16/2024 D.E. 271</p>	<p>Defense's Emergency Motion for Further Visual Inspection of Physical Evidence</p>	<p>Although there was already a Court Order that allowed for this, the Defense was forced to move this Court to enter an Order allowing the Defense to access and inspect the physical evidence held in the Hialeah Police Department property storage, specifically, kitchen knife with purple handle (item number 25 of property receipt), and metal piece (item number 43 of property receipt).</p> <p>Note: It is important to note here that this Court entered an Order on August 26, 2024, stating that "[i]n order to perform a physical inspection of the items of evidence held by the City of Hialeah Police Department, Defendant's counsel shall coordinate such inspection with the State." Defense counsel complied with this yet was unable to view these crucial items at the initial viewing, which of course caused the delay of having to file an emergency motion and coordinate another viewing.</p>
<p>11/21/2024 D.E. 273</p>	<p>Amended Discovery Exhibit</p>	<p>-Crime scene report - D. Rodriguez -Crime scene report - N. Mannarino -Crime scene report - Miranda & Rama</p> <p>Note: Nicole Mannarino, Yoan Rama, and Lanyene Miranda were scheduled for depositions by the Notice of Taking Deposition filed on 10/2/2024 to be held on 11/26/2024. This disclosure was provided five (5) days prior to their depositions and the production was <i>after</i> undersigned specifically requested these items. It is also important to note that D. Rodriguez is one of the 12 anticipated State trial witnesses so far.</p>
<p>11/26/2024 D.E. 274</p>	<p>Amended Discovery Exhibit</p>	<p>-Crime scene photos (10/19/2023) - N. Mannarino</p> <p>Note: The defense became aware that there</p>

		were additional photographs that had not been disclosed by the State through the deposition of Nicole Mannarino on 11/25/2024. The photos were sent over the next day. The photographs were provided over a year after the incident occurred but had been taken by Ms. Mannarino on October 19, 2023.
11/26/2024 D.E. 275	Amended Discovery Exhibit	State Witness # 68 Raniel Castillo (ID. 02877) listed.
12/3/2024 D.E. 356	Amended Discovery Exhibit	Crime scene report - R. Castillo (MDPD)
12/3/2024 D.E. 357	Notice of Taking Deposition	16 witnesses scheduled 12/16/2024 through 12/19/2024
12/20/2024 D.E. 361	Amended Discovery Exhibit	<p>-Additional extraction evidence by L. Salas (provided on flash drive)</p> <p>-Report - L. Salas</p> <p>-CV - L. Salas</p> <p>-Photos - Physical components of media ref. in report by L. Salas</p> <p>Note: Luis Salas was scheduled for deposition on December 18, 2024, by Notice of Taking Deposition filed on December 3, 2024. This production was provided two days prior to his deposition, and resulted in the need for this witness to be rescheduled. The evidence provided was significantly voluminous, which required extensive review, not only by the Defense team. It is also extremely important to note that Agent Salas is a key digital Expert witness in this case, and one of the 12 anticipated State trial witnesses. Further he was listed by the State in September of 2024.</p>

12/30/2024 D.E. 362	Amended Discovery Exhibit	<p>-Hand Written Notes - Det. Mui (8 pgs.)</p> <p>-Hand Written Notes - Det. Montalvo (2 pgs.)</p> <p>-Hand Written Notes - Det. Perez (4 pgs.)</p> <p>Note: The Defense only became aware of these notes through physical inspection of items stored in evidence on November 12, 2024. The Defense was not aware of these notes prior to the in-person inspection. These notes were provided as a result of undersigned requesting their production.</p>
1/14/2025 D.E. 365	Amended Discovery Exhibit	<p>State Witness #69 Bengal Dow (ID. 04558) listed.</p> <p>State Witness #70 Eric Kopp (ID. 04434) listed.</p> <p>State Witness #71 Jose Pico (ID. 02027) listed.</p> <p>State Witness #72 Jose Proveyer (ID. 01410) listed.</p> <p>Note: These witnesses were identified and requested to be listed by the Defense team.</p>
1/16/2025 D.E. 367	Notice of Taking Deposition	8 witnesses scheduled 1/29/2025 through 1/31/2025
1/17/2025		<p>The Defense attorneys were finally able to complete the physical inspection of the kitchen knife with purple handle (item number 25 of property receipt), and metal piece (item number 43 of property receipt).</p> <p>See above the reason for the 2 month delay on examining these two crucial items.</p>
1/23/2025 D.E. 370	Notice of Taking Deposition	Officer Acosta part two of his deposition set for 2/5/2025 at 11:00a.m.
2/3/2025	Amended Discovery Exhibit	State Witness #73 Marlon Espinoza (ID. 01452) listed.

D.E. 375		Note: The Defense identified and requested that the State list this witness.
2/3/2025 D.E. 376	Notice of Taking Deposition	Note: Officer Yadiel Casamayor was scheduled for deposition on March 3, 2025. It is important to note that Casamayor has failed to appear on 4 (including 3/3/25) different occasions and the Defense will be asking for Court intervention.
2/4/2025 D.E. 377	Amended Discovery Exhibit	State Witness #74 Randy Marrero (ID. 02029) listed Note: Important to note that Marrero was listed after pressing discussions about the digital evidence in this case, including discussions in open Court on 1/16/25.
2/5/2025 D.E. 378	Two Amended Discovery Exhibit filed	NBIN Test Fire Report, Lab Analysis Report State Witness #75 John Mancini (ID. 07020) State Witness #76 Emanuel Walton Jr. (ID. 05535) Note: It is important to note that this report, and these witnesses were produced <i>after</i> undersigned specifically requested the firearm testing and tool marking comparison reports. Also important to note these reports were completed in June 2024.
2/6/2025 D.E. 380	Defendant's Fifth Motion to Compel Discovery (All Digital Evidence)	In addition to digital evidence, the Defense requested <i>ALL</i> discovery from the Miami Dade State Attorney's Office, and requested this Court sign an Order directing the same.
2/6/2025 D.E. 382	Amended Discovery Exhibit	State Witness #77 Vanessa Najara (ID. 02140) listed. Note: The Defense identified, and requested that the State list this witness.

<p>2/13/2025 D.E. 385</p>	<p>Motion to Compel Identity of Social Media Username Electronic Evidence Exhibit List</p>	<p>Note: After the deposition of minor E.P, Defense filed a Motion to compel identity of social media usernames for this same witness.</p>
<p>2/13/2025 D.E. 388</p>	<p>Amended Notice of Taking Deposition</p>	<p>Note: Officer Yadiel Casamayor and N. Moya were scheduled to be deposed on 3/3/25. Important to note that officer Casamayor has not been deposed yet, he has now failed to appear on 4 different occasions, and as mentioned above the Defense is now in a position to seek Court intervention. He has failed to appear on: 11/26/2024, 12/16/2024, 1/30/2025 and 3/3/2025. Norvin Moya was finally deposed, after failing to appear on three prior occasions.</p>
<p>2/13/2025 D.E. 389</p>	<p>Eighth Notice of Taking Deposition</p>	<p>Wilber Gonzalez Magela Montalvo Michelle Andrade Guillermo Sevilla Luis Salas, USSS</p> <p>Note: Three out of these five witnesses have been deposed, and the other two are scheduled for March 17, and 18 respectively.</p>
<p>2/13/2025</p>	<p>Amended Case Management Order</p>	<p>The Amended Case Management Order provided that “[t]he State must disclose all expert witnesses by February 19, 2025.” The Amended Case Management Order also provided that expert witness reports which have been prepared shall be provided at the time of listing them as a witness. The State has failed to comply with the Case Management Order, in that on Paragraph 5 of their Discovery Response filed on 2/19/2025, they disclose that “mental health expert witnesses have been retained by the State”, however, they</p>

		fail to mention who those individuals are. Undersigned conferred with the State of Florida, inquiring whether they can provide these names privately by close of business on 2/19/2025, but the response was Further, failure by the State to actually list their experts, as required by the Amended Case Management Order, further delays the Defense in its overall preparation, including but not limited to complying with Section II, Subsection B.4 of the Amended Case Management Order, where it calls for “motions directed at the qualifications” of experts be filed by April 15, 2025.
2/14/2025 D.E. 390	Amended Discovery Exhibit	Digital images were previously provided on flash drives of the following devices -- -I-pads (2) -I-phones (2) Note: This production was a result of the fifth Motion to Compel filed on 2/6/2025.
2/17/2025 D.E. 392	Notice of Taking Deposition	-Frank Ramos was scheduled to be deposed on 3/25/25.
2/19/2025 D.E. 393	Amended Discovery Exhibit	State Witness #79 Brandon Garrido (ID. 02256) listed. State Witness #80 Jonatan Guifarro (ID. 02370) listed. Note: These witnesses were listed after the Defense identified and requested the State list them.
2/19/2025 D.E. 394	Amended Discovery Exhibit	State Witness #78 Sergio Cremisini Valdes D (ID. 07369) listed. Note: The Defense was alerted in February that this witness will be offering a report, and a PowerPoint for Trial, to date this has

		not been provided and as such this witness has not been deposed. The continuation of Expert Salas' Deposition is also pending on this Deposition, and per Court's own suggestion during Status hearing on May 15, 2025, will take place after Expert Cremisini is deposed.
2/20/2025 D.E. 396	Amended Discovery Exhibit	911 - Custodian certification
3/4/2025 D.E. 402	Amended Discovery Exhibit	<p>Body Worn Camera Detective Elosegui, Derek Rosa police interview</p> <p>Detective Mui Homicide report</p> <p>Note: It is extremely important to note that this BWC was turned over during the deposition of Detective Wilber Gonzalez as a result of the Detective making mention of it. Detective Wilber Gonzalez was also present for this interrogation. It is even more important to note that on this BWC we hear how <i>after</i> the interrogation, Det. Elosegui makes comments about the interrogation itself to the ASA present. These comments are NOT included in Det. Wilber Gonzalez's BWC. This note is important as Motions to Suppress evidence will be forthcoming on these issues, and the Defense assumed, that it was in possession of all interrogation videos.</p>
3/11/2025 D.E. 408	Amended Discovery Exhibit	<p>CV - Criminalist J. Mancini</p> <p>Report - Sgt. A. Powell (Huron PD)</p> <p>Note: Sgt. Powell's production came about as a result from Defense asking for Sgt. Powell to be listed, and to be provided a report.</p>

3/20/2025 D.E. 417	Amended Discovery Exhibit	State Witness # 81 Edsel Cortez listed. Mr. Cortez is the operations and safety supervisor at MCI and was deposed by the Defense shortly after being listed.
3/28/2025 D.E. 420	Amended Discovery Exhibit	Additional certified records by MCI Note: This production was the result of continuous requests by the Defense, and came after an important deposition of witness and MCI employee Guillermo Sevilla.
4/17/2025 D.E. 417	Amended Discovery Exhibit	BWC - Execution of search warrant (10-13-2023) BWC - Execution of search warrant (10-19-2023)
4/17/2025 D.E. 418	Amended Discovery Exhibit	Screenshots and screen-recordings from Subject's Cell Phone by Det. Mui This production is relevant to the digital aspect of this case, and Defense Expert was deposed on 4/14/2025, this information would have served useful prior to his deposition.
4/22/2025 D.E. 462	Amended Discovery Exhibit	American Airlines trip confirmation and receipt from November 18, 2023-GLPWFV
4/22/2025 D.E. 463 D.E.464	Amended Discovery Exhibit	Certified translations for dispatch calls
5/1/2025 D.E. 477	Amended Discovery Exhibit	State Witness # 82 Sgt. A. Powell
5/7/2025 D.E. 483	Amended Discovery Exhibit	Report of Osteological Examination - Dr. Heather Walsh-Haney Note: This production came about at the request of the Defense.

5/9/2025 D.E. 486	Amended Discovery Exhibit	Still shots upload information onto Axon Note: In preparation for a Motion in Limine to Exclude Unauthenticated Boifun Still Shots purporting to be Derek Rosa, the Defense requested the Axon Trail.
5/9/2025 D.E. 487	Amended Discovery Exhibit	State Witness # 83 Dr. Chelsea Cornell, and State Witness # 84 Dr. Heather Walsh-Haney listed. Note: The listing of these two witnesses, were requested by the Defense.
5/20/2025 D.E. 494	Amended Discovery Exhibit	Criminalist J. Mancini photos Note: Expert Mancini's deposition was scheduled for and took place on 5/27/2025.
5/29/2025 D.E. 500	Amended Discovery Exhibit	Text messages between MCI witness E. Cortez and Det. Elosegui MCI Express - Updated records custodian certification Note: Mr. Cortez Deposition took place on 5/23/2025.
6/13/2025 D.E. 509	Amended Discovery Exhibit	Worksheets & photos - Criminalist J. Mancini Note: Expert Mancini's Deposition took place on 5/27/2025. The Worksheets and photos were provided by MDSO pursuant to a Court Order, after Defense compelling the same.
6/16/2025 D.E. 513	Amended Discovery Exhibit	Screenshots (12) of Whatsapp group messages discussed during deposition of Det. K. Mui Scene/body photos provided by Det. K. Mui
6/18/2025 D.E. 519	Amended Discovery Exhibit	Call detail and subscriber records with custodian certification (UTC) - Iran Garcia
6/18/2025	Amended Discovery Exhibit	Facebook messages between F.R and

D.E. 520		Facebook User H.H. Note: The Defense previously requested these messages multiple times.
6/30/2025 D.E. 523	Amended Discovery Exhibit	State's adoption and incorporation of Defense Witnesses Jose Rosa, Isabel Acosta, and Iran Garcia.
6/30/2025 D.E. 524	Amended Discovery Exhibit	State Witness # 85, Expert Toby Wolson was formally listed.
7/9/2025 D.E. 528	Amended Discovery Exhibit	Expert Toby Wolson's Report Note: As it stands on today's date, pre trial Motions are due in less than 30 days.

Status of Law Enforcement and Civilian Witnesses' Production and Depositions

Witness	Items Received	Date Received	Still Missing
(1) Joseph Elosegui* 0958	Interviews of Minor Children BWC Mr. Cortez's Interview Supplemental Report Screenshot - Texts with Ramos Interview w/ Verdecia Two Sworn Statements of Frank Ramos Screenshot of Whatsapp communication with Verdecia BWC of Derek Rosa's police interrogation	3/4/2024; 3/11/2024 5/28/2024 5/30/2024 6/24/2024 6/24/2024 7/17/2024 8/6/2024 2/28/2025	Unknown
(2) Kenneth Gutierrez* 2366 8/26/2024	Report BWC	4/29/2024 5/6/2024; 8/22/2024	Unknown
(3) Wilber Gonzalez* 1527 2/28/2025	BWC of Derek Rosa's Recorded Statement Report-	11/30/2023 5/3/2024	Unknown

	Supplemental Reports (2)		
(4) Kinshun Mui*1998	Report	4/29/2024	Unknown
	BWC of Iran Garcia Interview	6/24/2024	
	Preliminary Death Investigation Report	9/4/2024	
	Handwritten Notes	12/30/2024	
	Report (Approved 2/25/25)	3/4/2025	
Mui (Continued)	Screenshots and screen-recordings from Subject's Cell Phone by Det. Mui	4/17/2025	
	Screenshots (12) of Whatsapp group messages discussed during deposition	6/16/2025	

	of Det. K. Mui Scene/body photos provided by Det. K. Mui		
(7) Reinaldo Alvarez* 2217 5/7/2024	Report-Supplemental Report BWC	5/3/2024 5/3/2024	BWC; otherwise unknown Note: This witness was a key officer on the scene. The Defense has requested additional BWC relating to this officer, as what was provided was only three (3) minutes long.
(8) Robert Acosta* 2346 12/16/2024; 2/5/2025 Now BSO	Report BWC	4/29/2024 5/8/2024; 8/21/2024	Unknown
(9) Alfredo Santos Concha* 2318 5/16/2024	Report BWC	4/29/2024 5/14/2024	Unknown
(10) Ernesto Del Valle* 1968 5/7/2024	Report BWC	4/29/2024 5/3/2024	Unknown
(11) Stephanie Rodriguez* 2319 5/16/2024	Report BWC	4/19/2024 5/7/2024	Unknown
(12) Steven Bauer* 2227 5/16/2024	Report BWC	4/29/2024 5/14/2024	Unknown
(13) Raymond Tellez Ferriol* 2354 12/16/2024	BWC	5/15/2024	Unknown
(14) Alfonso Delgado* 2225 8/27/2024	Report BWC	4/29/2024 8/22/2024	Unknown
(15) Renato Bejar* 2247 10/10/2024	BWC	9/4/2024	Unknown
(16) Daniel Alfaro Aramburo* 2337 12/16/2024	BWC	9/4/2024	Unknown

(17) Louis Lahera* 2134 10/11/2024	BWC	9/4/2024	Unknown
(18) Emanuel Gonzalez* 2044 8/29/2024	BWC	8/22/2024	Unknown
(19) Michael Bendamio* 1360 8/29/2024	BWC	8/22/2024	Unknown
(20) Lazaro Echevarria Ramos* 2228 8/29/2024	BWC	5/23/2024	Unknown
(21) Justin Lastra* 2397 8/26/2024	BWC	8/22/2024	Unknown
(22) Hector Casinol Perez* 2159 8/30/2024	BWC	8/22/2024	Unknown
(23) Yeneisy Gonzalez* 2398 8/30/2024	BWC	8/22/2024	Unknown
(24) Jardy Alonso Gonzalez* 2232 8/30/2024	BWC	8/22/2024	Unknown
(25) Jonathan Lopez* 2160 8/30/2024	BWC	5/23/2024	Unknown
(26) Juan Rico* 2347 8/27/2024	Report BWC	4/29/2024 5/30/2024	Unknown
(27) Brianne Natareno* 2295/0263 11/25/2024	Report BWC	4/29/2024 5/23/2024	Unknown
(28) Magela Montalvo* 1786 3/5/2025	Report BWC Interview with Isabel Acosta Handwritten Notes	4/29/2024 5/28/2024 12/30/2024	Unknown
(29) Felix Perez* 2295 5/7/2024	Report Handwritten Notes	4/29/2024 12/30/2024	Unknown
(30) Gene DeLima* 1621 5/7/2024			Unknown (Specifically any

			reports, BWC or crime scene logs)
(31) Dexter Tillmon *			Unknown
(32) Richard Quintero* 1249 12/17/2024			Everything
(33) Manuel Moreno* 2221 11/25/2024			Everything
(34) Raul Fiallo Morrell* 2220 10/11/2024			Everything
(35) Norvin Moya* 2348 3/3/2025	BWC	9/9/2024	Unknown
(36) Deymon Bordon* 2180 11/26/2024	BWC	9/9/2024	Unknown
(37) Boris Herrera Valdes* 2403 11/26/2024	BWC	9/9/2024	Unknown
(38) Yoan Rama* 2425 1/30/2025	Crime Scene Report (co- authored with Lanyene Miranda)	11/21/2024	Unknown
(39) Lanyene Miranda* 1588 12/19/2024	Supplemental Report Crime Scene Report (co- authored with Yoan Rama)	4/29/2024 11/21/2024	Unknown
(40) Nicole Mannarino* 2373 11/25/2024	Supplemental Report Crime Scene Report Crime Scene Photos (10/19/2023)	4/29/2024 11/21/2024 11/26/2024	Unknown
(41) Destiny Rodriguez Mesa* 2414 1/31/2025	750 Crime Scene Photos Report	11/16/2023 4/19/2024	Unknown

	Report	4/29/2024	
(47) Alberto Duque* 1956 12/17/2024			Everything
(48) Alexander Dorado* 1082 1/31/2025	Supplemental Report	9/4/2024	Unknown
(49) Dustin Hernandez* 2079 10/11/2024	Four Doorbell Clips Supplemental Report	2/2/2024 4/29/2024	Unknown
(57) Michelle Andrade* (Expert – MDPD ID. 08678)	Lab Analysis Report 4-26-2024	5/15/2024	Unknown
(58) Tangela Henderson* (MDPD ID. 08448)	Lab Analysis Report 10-21-2023	5/15/2024	Unknown
(60) Luis Salas (Expert - USSS)	Flashdrive of partial extraction evidence by L. Salas (provided on flash drive) CV - L. Salas Report - L. Salas Photos - Physical components of media ref. in report by L. Salas (through bigfiles)	5/29/2024 12/20/2024	
(62) Carlos Zerbinati* 2219 10/10/2024	BWC	9/5/2024	Unknown
(63) Tiffany Pereira Da Costa* 2424	BWC	9/9/2024	

10/11/2024			
(64) Alejandro Marin* 2406 11/26/2024	BWC	9/9/2024	Unknown
(65) Leonel Hernandez* 2323 12/17/2024	BWC	9/9/2024	Unknown
(66) Yadiel Casamayor* 2113	Report BWC	4/29/2024 9/9/2024	Unknown
(67) Jose Romero* 1963 12/18/2024	Supplemental Report	4/29/2024	Unknown
(68) Raniel Castillo* (MDPD) 2877 12/19/2024	28 photographs (5/22/2024) Crime Scene Report dated 5/22/2024	6/24/2024 12/3/2024	Unknown
(69) Bengal Dow (MDPD) 4558 Listed as B Witness			Everything
(70) Eric Kopp (MDPD) 4434 Listed as B Witness			Everything
(71) Jose Pico 2027 Listed as B Witness			Everything
(72) Jose Proveyer 1410 Listed as B Witness			Everything
(73) Marlon Espinoza 1452 Listed as B Witness			Everything
(74) Randy Marrero *(Expert) 2029			Unknown
(75) John Mancini *(Expert – MDPD) 7020	Section Laboratory Ballistic Report Resume	Emailed by ASA Borst 2/5/2025 3/10/2025	Unknown
(76) Emmanuel Walton Jr.* (Expert – MDPD) 5535	NIBIN Test Fire Report	2/5/2025	Unknown

	IBIS TRAX	2/5/2025	
(77) Vaness Najara 2140 Listed as B Witness			Everything
(78) Sergio Cremisini Valdes 7369			Everything
(79) Brandon Garrido 2256 Listed as B Witness			Everything
(80) Jonathan Guifarro 2370 Listed as a B Witness			Everything
(81) Edsel Cortez*	Text messages between Cortez and Det. Elosegui MCI Express - Updated records custodian certification	5/29/2025	Complete text exchange
(82) Sgt. A. Powell Listed as a C witness	Report	3/11/2025	Unknown
(83) Dr. Chelsea Cornell *			
(84) Dr. Heather Walsh- Haney Listed as a C Witness	Report	5/7/2025	Unknown
(85) Expert Toby Wolson	Report	7/9/2025	Unknown

**=Witness has been deposed*