

Here you find Assistant State Attorney, Kevin Humphries, offering a plea deal to me, but (and more importantly), Humphries (on p.5 below) admits knowledge of exhibits which clearly show the officers who wrote their report perjured. It's but a small thing to compare the 'arrest report' with the 'tape recordings' of when I called in to the police station initially to report something suspicious. ALSO, notice Justin Gaines assigned as my public defender. I repeatedly reported to him the cops were bad cops who had perjured themselves, thus proving my innocence. -Gordon Wayne Watts, LAKELAND, Fla. 9-14-2010

$$\left(\frac{684}{x}\right)\left(\frac{339}{x}\right) = \frac{36}{x}$$

Gaines
PTR: 6/19 PD

STATE OF FLORIDA
VS

CASE NO: MM03-00378-XX

Gordon Watts

OFFER BY STATE FOR A NEGOTIATED PLEA

30

DAYS IN PCI (TOTAL)

STRAIGHT

SUSPENDED

WEEKEND WORK RELEASE, IF ALLOWED BY COURT

CONCURRENT/CONSECUTIVE TO CASE NO: _____

MONTHS PROBATION

SPECIAL CONDITIONS OF PROBATION

ACS HOURS

AIM CLASS

DAY VEHICLE IMPOUND

DUI COUNTER ATTACK SCHOOL

DUI MULTI OFFENDER SCHOOL

VICTIM IMPACT PANEL

ALCOHOL EVALUATION AND TREATMENT

DRUG EVALUATION AND TREATMENT

RANDOM URINALYSIS/WARRANTLESS SEARCH/SEIZURE

NO CONTACT WITH VICTIM

STAY AWAY FROM _____

NCTI SCHOOL

EARLY TERMINATION

ACF MILEPOST

INVESTIGATIVE COSTS IN THE AMOUNT OF \$125 to CPD

PAYABLE TO: _____

DRIVER'S LICENSE SUSPENSION

FINE AND COURT COSTS IN THE AMOUNT OF \$ _____

DETERMINED BY THE COURT

RESTITUTION IN THE AMOUNT OF \$ _____

DETERMINED BY THE COURT

W/H OF ADJUDICATION IF ALLOWED BY THE COURT

OTHER Defendant

ABOVE PLEA OFFER INCLUDES ALL SANCTIONS REQUIRED BY LAW INCLUDING
MANDATORY LICENSE SUSPENSIONS

THIS OFFER IS VALID THROUGH PRE-TRIAL CONFERENCE AND UNLESS
NOTIFICATION OF ACCEPTANCE IS RECEIVED ON OR BEFORE THAT DATE, THIS
OFFER MAY BE WITHDRAWN BY THE STATE.

Kevin Humphries
ASSISTANT STATE ATTORNEY
KEVIN HUMPHRIES

5-30-03
DATE

$$(684)(339) = 36$$

GORDON WAYNE WATTS
CRIMINAL DIVISION
PTC: 6/19 PD

IN THE COUNTY COURT OF THE TENTH JUDICIAL CIRCUIT, CRIMINAL DIVISION
IN AND FOR POLK COUNTY, FLORIDA

CASE NO. 53-2003-MM-003784-01XX-XX
AGENCY REPORT NO.: LKPD 2003-34691

DIVISION M6

STATE OF FLORIDA

DISCOVERY EXHIBIT
DEMAND FOR RECIPROCAL DISCOVERY

VS.

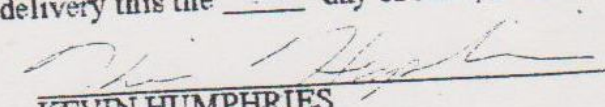
GORDON WAYNE WATTS

The State of Florida, by and through the undersigned Assistant State Attorney, hereby responds to the Notice of Discovery filed on behalf of the Defendant, pursuant to Rule 3.220(a)&(b), Florida Rules of Criminal Procedure. The State hereby demands reciprocal discovery and all disclosure required by the Defendant, pursuant to Rule 3.220(a)(c)&(d), Florida Rules of Criminal Procedure.

NOTICE IS HEREBY GIVEN that all information and material as defined by Rule 3.220(a), Florida Rules of Criminal Procedure, within the State's possession or control has been disclosed by providing copies of all reports and statements in the State Attorney's file to the Attorney for the Defendant.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED by the undersigned that a true and correct copy of the foregoing Answer to Demand for Discovery; and Demand for Reciprocal Discovery; has been furnished to the Public Defender by hand delivery this the 2 day of June, 2003.


KEVIN HUMPHRIES

Assistant State Attorney
Florida Bar Number: 0627801

Defendant's Name : GORDON WAYNE WATTS

Case Number : 53-2003-MM-003784-01XX-XX

Handwritten notes: "C-11125" and "4/19/12"

(A) LIST OF PERSONS KNOWN TO HAVE INFORMATION

WITNESS CATEGORY A

- ALL DEFENSE WITNESSES
- ALL WITNESSES LISTED IN REPORTS
- RECORDS CUSTODIAN - PCSO/FINGERPRINT EXPERT

OFC. CHARLES E DALLAS
 LAKELAND POLICE DEPT
 219 MASSACHUSETTS AVENUE NO
 LAKELAND, FL 33801

OFC. DENNIS MOSSER
 LAKELAND POLICE DEPT
 219 MASSACHUSETTS AVENUE NO
 LAKELAND, FL 33801

OFC. LEANNE YEAGER
 LAKELAND POLICE DEPT
 219 MASSACHUSETTS AVENUE NO
 LAKELAND, FL 33801

Witnesses marked with an "X" must be deposed at the State Attorney's Office.

- (E) Accused's Own Testimony ()
- (F) Object's Accused - See (E) ()
- (G) Confidential Information ()
- (H) Electronic Surveillance ()
- (I) Search and Seizure ()
- (J) Expert Report:
 - Chemist ()
 - Doctor ()
 - Document Analyst ()
 - Fingerprint ()
 - Photograph ()
 - Drug Pharmacology ()

(B) WITNESS STATEMENT: Oral (X) Verbatim Recital ()
Written (X) Recorded ()

All Statements by Person in (A) (X)

All Statements on Offense Reports (X)

Witness: ALL LISTED IF ANY

Substance: SEE REPORTS IF ANY

(C) ACCUSED STATEMENT: Oral (X) Verbatim Recital ()
Written (X) Recorded ()

All Statements by Person in (A) (X)

All Statements on Offense Reports (X)

Witness: ALL LISTED IF ANY

Substance: SEE REPORTS IF ANY

(D) CODEFENDANT STATEMENT: Oral () Verbatim Recital ()
Written () Recorded ()

All Statements by Person in (A) ()

All Statements on Offense Reports ()

Witness:

Substance:

(E) Accused's Grand Jury Testimony: ()

(F) Object's Accused - See (K) ()

(G) Confidential Information ()

(H) Electronic Surveillance ()

(I) Search and Seizure ()

(J) Expert Report: Chemist () Fingerprint ()

Doctor () Firearms ()

Document Analyst () Drug Paraphernalia ()

Microanalyst () Atomic Absorption ()

Serologist () Handwriting Analyst ()

Drug customs, Language, Operations ()

Other: ()

(K) Trial Exhibits: (See below) (X)

(4) Information Negating Guilt: ()

() COLUMN CHECKED ONLY IF THERE'S A VIDEO OR AUDIO TAPE

NOTE: DEFENSE COUNSEL MAY COPY, LISTEN TO, AND/OR VIEW AUDIO/VIDEO TAPE RECORDINGS AT THE ORIGINATING LAW ENFORCEMENT AGENCY.

(K) TRIAL EXHIBITS:

- ARREST REPORT
- CERTIFIED COPY OF CONVICTIONS
- INVENTORY AND RECEIPT
- INVESTIGATIVE COSTS AFFIDAVIT
- ITEMS LISTED IN OFFENSE REPORTS
- WITNESS STATEMENT
- WRITTEN STATEMENT

see if that is state / F.B. Rules / State law Civil Procedure / Constitution

see if that only refers to items already in evidence - bearing other stuff to chapter 119 public records - or, instead, if that allows all items in

see if ^{Public Holder} attorney has finally gotten discovery

Library: Survey Statistics Formulae	Lakeland Radio: Mark Larson Daniel Ritz: Cal. Monday	Do Not Call.gov
-------------------------------------	---	-----------------

of items

Ro Dep Looco Sgts Smith + Perez	PCSO Internal Address Comp Unit 03-060	Demand for Discovery: Part II + Letter to Ted Jacobson	Motion to recuse Judge + Bailiff	www.wps.com Get correct Mailing Zip codes Boston Ave Bartow 257 N. Broadway
------------------------------------	---	---	----------------------------------	--