

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

CASE NUMBER: 2022 101651 CFDL

STATE OF FLORIDA,

Plaintiff,

vs.

IYANNA ROLLINS,

Defendant.

**NOTICE OF APPEARANCE, WAIVER OF ARRAIGNMENT, PLEA OF NOT GUILTY,
NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY, DEMAND FOR
CRIMINAL RECORDS AND EXCULPATORY INFORMATION**

The undersigned attorney of The Umansky Law Firm, files this Notice of Appearance on behalf of the Defendant in the above-styled cause. The Defendant, by and through the undersigned attorney, hereby waives appearance for purposes of Arraignment and enters a plea of Not Guilty to the charges filed in this cause. The Defendant hereby requests a Jury Trial on the said charges and requests a copy of the Information filed against the Defendant.

Pursuant to Fla. R. Crim. P. 3.220, the Defendant hereby serves notice of the Defendant's intent to participate in discovery and requests the following information be provided by the prosecution for inspection, copying, testing, and/or photographing:

1. The names and addresses of all persons known to the prosecutor to have any information which may be relevant to the offense charges, and to any defense with respect thereto.
2. The statement(s) of any person whose name is furnished in compliance with the preceding paragraph. The term "statement" as used herein includes any written statement made by said person and signed or otherwise adopted or approved, and also includes any statement of any kind or manner made by such person and written

or recorded or summarized in any writing or recording. The term “statement” is specifically intended to include all police and investigative reports of any kind prepared for, or in connection with, this case.

3. 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.
4. Any written or recorded statements and the substance of any oral statements made by a co-defendant if the trial is to be a joint one.
5. Those portions of recorded grand jury minutes that contain testimony of the accused.
6. Any tangible papers or objects which were obtained from or belonged to the accused.
7. Whether the State has any material or information which has been provided by a confidential informant.
8. Whether there has been any electronic surveillance, including wiretapping, of the premises of the accused, or of conversations to which the accused was a part, and any documents relating thereto.
9. Whether there has been any search or seizure and any documents relating thereto.
10. 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.
11. Any tangible papers or objects which the prosecuting attorney intends to use in the hearing or trial and which were not obtained from or belonged to the accused.
12. Specifically, pursuant to Fla. R. Crim. P. 3.220(b)(2), the Defendant demands that the Office of the State Attorney disclose to defense counsel any material information within the State’s possession or control which tends to negate the guilt of the accused as to the offense charged. This demand is made under the authority of *State v. Gillespie*, 227 So. 2d 550 (Fla. 2d DCA 1969). The State must disclose this information in the preceding paragraph, regardless of whether the Defendant has incurred reciprocal discovery obligations.

13. Pursuant to *Brady v. Maryland*, 373 U.S. 83 (Fla. 1963), *Giles v. Maryland*, 386 U.S. 66 (Fla. 1967), *State v. Crawford*, 257 So. 2d 898 (Fla. 1972), and *State v. Coney*, 294 So. 2d 82 (Fla. 1973), the Defendant further demands that the Office of the State Attorney disclose to the defense any record of prior criminal convictions of the Defendant or of any persons whom the Office of the State Attorney intends to call as witnesses at any hearing or trial in this cause.
14. The undersigned attorney hereby certifies that the above demands are made in good faith and not for the purpose of delay.

WHEREFORE, the Defendant by and through the undersigned counsel, respectfully requests that the prosecution provide the above information pursuant to the discovery obligations set forth in Fla. R. Crim. P. 3.220 in a manner mutually agreeable to the State and defense, or provide notice that a court order need be sought in accordance.

/s/ Brice Aikens, B.C.S.
Brice Aikens, B.C.S., Esq.
Fla. Bar. No. 25655
THE UMANSKY LAW FIRM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been E-filed with the Clerk of Court through the E-Portal and has been served to the Office of the State Attorney EserviceVolusia@sao7.org on July 25, 2022.

/s/ Brice Aikens, B.C.S.
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