

IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY,
FLORIDA

CASE NO. 2012-CF-35337-A

STATE OF FLORIDA,

Plaintiff,

vs.

BRANDON LEE BRADLEY,

Defendant.

_____ /

MOTION FOR DISCLOSURE OF IMPEACHING INFORMATION

The Defendant, BRANDON LEE BRADLEY, pursuant to article I, sections 2, 9, 16, 17 and 22 of the Florida Constitution and the Fifth, Sixth, Eighth and Fourteenth Amendments of the United States Constitution, moves this Court to require the State to disclose the following:

1. The substance of any and all statements, agreements, offers or discussions had with any of the State's witnesses or a suggestion of lenience, compensation, assurance not to prosecute, assurance to proceed only on certain causes, or offer of any other benefit accruing to said individual whatsoever in exchange for their cooperation, assistance of testimony in the trial herein;

2. Any and all consideration or promises of consideration given to or made on behalf of government witnesses. By "consideration," Accused refers to absolutely anything of value or use including but not limited to money, immunity grants, witness fees, special witness fees, transportation assistance, assistance or favorable treatment with respect to any criminal, civil, tax court, or administrative dispute with plaintiff, and anything else which could arguably create an interest or bias in the witness if favor of the State or against the defense or act as an inducement to testify or to color testimony;

3. Any and all prosecutions, investigations or possible prosecutions pending or which could be brought against the witness and any probationary, parole or deferred prosecution status of the witness;

4. Any and all records and information revealing felony convictions attributed to this witness;

5. Any and all records and information showing prior misconduct or bad acts committed by the witness;

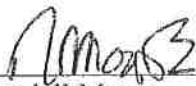
6. Any and all personal files for the witness.

As grounds in support of said Motion the Accused states as follows:

The evidence of any such offers or representations which have been made by the State or which the State will make at any future time of any witness for the State should be discoverable pursuant to the Due Process Clause of the United States Constitution, Amendments 5, 8 and 14, and the Florida Constitution, article I, and the withholding of any such evidence constitutes a denial of the Accused herein of his constitutionally protected rights to due process and fundamental fairness as well as his right to effectively cross-examine and impeach the witness against him as guaranteed by the United States Constitution, Amendment 6 and Florida Constitution, article I, sections 9 and 16.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-service to the Office of the State Attorney, Brevard County, Florida, this 8th day of November, 2013.



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