

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

CASE NO.: 01-2024-CF-001836-A

DIVISION: IV, Felony

vs

DAVID STEPHEN SAUNDERS,

Defendant.

**NOTICE OF APPEARANCE, PLEA OF NOT GUILTY  
AND NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY**

PLEASE TAKE NOTICE of the appearance of the LAW OFFICES OF GLASSMAN &  
ZISSIMOPULOS as counsel for the above-named Defendant.

**PLEA OF NOT GUILTY**

COMES NOW, the Defendant, by and through his/her undersigned attorney and files his/her written Plea of Not Guilty to the offense charged in the above-styled cause, and by such plea waives formal arraignment herein and requests a jury trial.

The Defendant hereby demands a copy of the Information or Indictment against him/her, pursuant to Rule 3.140(m) RCrP.

Said Defendant files said Plea, reserving the right to file any appropriate motions in said cause within ten (10) days from the date of this motion.

**NOTICE OF DEFENDANT'S INTENT  
TO PARTICIPATE IN DISCOVERY**

COMES NOW, the Defendant, by and through undersigned counsel and pursuant to Rule 3.220 (b) (1), Florida Rules of Criminal Procedure (as amended July 1, 1989) and hereby serves notice of his/her intent to participate in discovery and requests the following information to be provided by the prosecution for inspection, copying, testing or photographing.

(i) The names and addresses of all persons known to the prosecutor to have information which may be relevant to the offense charged, and to any defense with respect thereto; and

(ii) The statement of any person whose name is furnished in compliance with the preceding paragraph. The term "statement" as used herein includes a written statement made by said person and signed or otherwise adopted or approved by him, and also includes any statement of any kind of 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 the case.

(iii) Any written or recorded statements and the substance or 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.

(iv) 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.

(v) Those portions of recorded grand jury minutes that contain testimony of the accused.

(vi) Any tangible papers or objects which were obtained from or belonged to the accused.

(vii) Whether the State has any material or information which has been provided by a confidential informant.

(viii) Whether there has been any electronic surveillance, including wiretapping, of the premises of the accused, or of conversations to which the accused was a party; and, any documents relating thereto.

(ix) Whether there has been any search or seizure and any documents relating thereto.

(x) Reports or statements or experts made in connection with the particular case, including results of physical or mental examinations and of scientific tests, experiments or comparisons.

(xi) 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.

(xii) Any police work product, including but not limited to, emails, correspondence, and pre-action plans, which the prosecuting attorney intends to use or rely upon in the hearing or trial.

The undersigned certifies that the NOTICE is filed in good faith pursuant to Rule 3.220 (n)(3) Florida Rules of Criminal Procedure (as amended July 1, 1989).

WHEREFORE, the Defendant, by and through undersigned counsel respectfully requests the prosecution to provide the above information pursuant to Rule 3.220 (b)(1) (1989) in a manner

mutually agreeable to State and defense, or provide notice that a court order need be sought in accordance with Rule 3.220 (b)(3) Florida Rules of Criminal Procedure (1989).

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the Office of the State Attorney, via e-service at [eservice@sao8.org](mailto:eservice@sao8.org) this 4<sup>th</sup> day of June, 2024.

GLASSMAN & ZISSIMOPULOS

/s/ Nick G. Zissimopoulos

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