

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

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 2012-001083-CFA

GEORGE ZIMMERMAN,

Defendant.

_____ /

MOTION TO COMPEL ADDITIONAL DISCOVERY

COMES NOW the defendant, GEORGE ZIMMERMAN, through counsel and moves this Honorable Court to enter its Order directing the State Attorney's Office to provide additional discovery in this cause and in support thereof would show the following:

1. On November 8, 2012, the state filed its 9th supplemental discovery exhibit disclosing twelve additional witnesses, a number of miscellaneous investigative reports/updates from FDLE and several reports of witness interviews from the FBI.

2. A review of those documents/reports provided reference additional documents and reports that are discoverable but are not included in this 9th Supplemental Discovery Exhibit.

3. The defendant moves this Court to order the state to provide those additional documents and reports more specifically set forth below. The items referenced in the discovery exhibit but not provided as part of the disclosure that are now requested are the following:

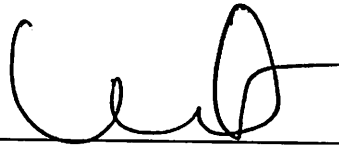
- 1) As referenced in FDLE report Serial #1, a copy of 18th Circuit State Attorney Norman Wolfinger's letter requesting assistance that he sent to FDLE on 3/15/12; a copy of Mr. Wolfinger's investigative file that he gave to FDLE on 3/16/12 and a copy of the included the Sanford Police Department's investigative file and all other related material under case # 20125000113.

- 2) As referenced in FDLE report Serial #18, 19, 54, 56, all biographical profiles generated by analysts at FDLE, including, but not limited to those listed below:
 - a. George Zimmerman
 - b. Trayvon Martin
 - c. Witness 1
 - d. Witness 2
 - e. Witness 5
 - f. Witness 6
 - g. Witness 7
 - h. Witness 11
 - i. Witness 13
 - j. Witness 16
 - k. Joseph Bruce Oliver
 - l. Witness 17
 - m. Witness 18
 - n. Witness 19
 - o. Witness 20
 - p. Witness ?? (Witness referenced in discovery but not officially designated a witness number by the state, so out of an abundance of caution the name is being withheld.)
- 3) As referenced in FDLE report Serial #20, any materials, memos, minutes, or reports generated from the 3/22/12 transition meeting between the 18th Circuit State Attorney and the special appointed 4th Circuit State Attorney Offices.
- 4) As referenced in FDLE report Serial #26, any surveillance video obtained from surrounding entities of Twin Lakes, including, but not limited to:
 - q. Sam's Club
 - r. Trustco Bank
 - s. M&I/BMO Harris Bank
 - t. Lake's Edge Apartments
 - u. Kohl's
- 5) As referenced in FDLE report Serial #28, all supporting documents received by FDLE or prepared in connection with its 3/27/12 request to T-Mobile to produce records and location data, specific to telephone number 786-312-****, including any court orders and materials received pursuant to said court order.
- 6) As referenced in FDLE report Serial #57, application and court order received by FDLE on 5/1/12 requesting that Google provide any and all stored data as it relates to the account of 786-312-****, including any materials received pursuant to said court order.

- 7) As referenced in FDLE report Serial #57, the application and court order received by FDLE on 5/14/12 requesting that T-Mobile reactivate voice and data service to the account of 786-312-****, including any materials received pursuant to said court order.
- 8) All information received by FDLE from the Department of Economic Opportunity pertaining to this case.
- 9) As referenced in FDLE report Serial #40, a copy of the recorded Crime Line tip received on 3/23/12 from an anonymous caller who claimed there was a child who resides in Twin Lakes that witnessed some or all of the incident of February 26, 2012 including notes and details of the follow up investigation.
- 10) As referenced in FDLE report Serial #58, 59, any materials, reports, interviews, or memos generated from Witness 8's Aug. 2nd-3rd meeting with the State Attorney's Office in Jacksonville.

WHEREFORE, the defendant urges this Honorable Court to grant the relief requested.

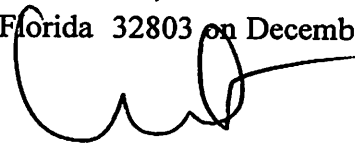
Respectfully submitted,



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Co-Counsel for George Zimmerman

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing was delivered by facsimile transmission and/or email to Bernardo de la Rionda, Assistant State Attorney and John Guy, Assistant State Attorney, Office of the State Attorney, 220 East Bay Street, Jacksonville, Florida 32202-3420 and to Mark M. O'Mara, 1416 East Concord Street, Orlando, Florida 32803 on December 10, 2012.



DONALD R. WEST