

IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, CRIMINAL DIVISION
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 2017CF008722AMB DIVISION: "X"

STATE OF FLORIDA

vs.

SHEILA KEEN-WARREN,

Defendant.

DISCOVERY EXHIBIT (ANSWER TO
NOTICE OF DISCOVERY); DEMAND
FOR RECIPROCAL DISCOVERY
EXHIBIT AND

DEMAND FOR NOTICE OF ALIBI

The State of Florida, by and through the undersigned Assistant State Attorney, hereby responds to the **Notice of Discovery** made on behalf of the Defendant, pursuant to Rule 3.220(a)&(b), Florida Rules of Criminal Procedure, and gives notice 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 to the Defendant by providing copies of all reports and statements in the State Attorney's file to the Attorney for the Defendant. The State hereby demands a **Reciprocal Discovery Exhibit** and all disclosure required by the Defendant, pursuant to Rule 3.220(a)(c)&(d), Florida Rules of Criminal Procedure. Further, the State hereby demands **Notice of Alibi** pursuant to Rule 3.200, Florida Rules of Criminal Procedure.

The Attorney for the Defendant, Richard Lubin, Esq , is hereby granted permission to inspect, copy, test, and photograph the information and material described within the documents attached to this answer, or which is being held in the custody of the investigating law enforcement agency, if prior notice has been

given to the undersigned of any such inspection, copying, testing, or photographing.

Respectfully submitted,

DAVID ARONBERG
STATE ATTORNEY

/s/ 

By: _____
REID SCOTT
Assistant State Attorney
Florida Bar No. 0028413

Defendant's Name : SHEILA KEEN-WARREN

Case Number : 2017CF008722AMB

Division: X

ALL WITNESSES LISTED IN REPORTS PROVIDED

PERSONS KNOWN TO HAVE INFORMATION
--

WITNESS CATEGORY A

MR. JOSEPH AHRENS
620 TREMONT STREET
CEDAR FALLS, IA 50613

MS. REGINA ALBARO
TO BE PROVIDED

MR. SAM ALTSCHUL

INV MARK ANDERSON #748
STATE ATTORNEY'S OFFICE

MS. KARA BANNON #3605
PALM BEACH COUNTY SHERIFF'S OFFICE
3228 GUN CLUB ROAD
WEST PALM BEACH, FL 33406

MR. ROBERT THOMAS BREWSTER III
1722 DORCHESTER PL
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LT BILL K. BROWN #1174
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GUY M CALAVENZO

DET IRIS CAMPBELL #7452
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DET JOHN R. CARNEY #3032

MR. BOBBY JOE CARTER
TO BE PROVIDED

MEDIC JOSEPH CASELLA #81416
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405 PIKE ROAD
ROYAL PALM BEACH, FL 33411-3815

MEDIC RICHARD CHRISTIAN
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DR. CECELIA CROUSE EXPERT WIT #4702
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DM MATT DAVIS
ABINGDON COUNTY

MARY DEFRANCESCO
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MS. LISA DICARLO
TO BE PROVIDED

DS JEFFERY L. EASTON #2555
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SGT MARK A. EVANS #2223
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MS. JANIE FITTON
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STUART, FL 34997

MR. MICHAEL D. FREE #1879
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OFC. DEWEY FULTON
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ABINGDON, VA

MR. RAY GREGORY

TO BE PROVIDED

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MR. WILLIAM KRAMER
TO BE PROVIDED

DS NICHOLAS LENTINI #7321
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DS EDWARD LUTY #3862
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DS JENELLE NEWELL #1575

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JODY OCASCINO
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LOT 73
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MS. DEBRA REHKER
21700 HILLSIDE DR
CLINTON TOWNSHIP, MI 48035

MS. ELISSA RESTIVO
TO BE PROVIDED

MR. VINCENT RESTIVO
TO BE PROVIDED

DET PHILLIP WAYNE ROBINSON #2144

OFC. BERNARD ROLL
C/O NASSAU COUNTY POLICE DEPT
TO BE PROVIDED

MS. DINAH ROSALES
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DEBORAH LEE SMALL
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TECH CELYNDA M. SOWARDS EXPERT WIT #8552
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OCALA, FL 34470

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WEST PALM BEACH, FL 33406

COL. JAMES E. STORMES #443
PALM BEACH GARDENS POLICE DEPARTMENT
10500 N. MILITARY TRAIL
PALM BEACH GARDENS, FL 33410

DET FRANCISCO J. TOMAS #4823
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MS. JAMIE MARIE TWING
TO BE PROVIDED

MR. LEE TYRELL
TO BE PROVIDED

HEATHER WARD

TECH JAMES E. WERRING #3519
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DS WILLIAM F. WILLIAMS #3034
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MR. CHARLES EDWARD WOOTEN
14608 82ND LANE NORTH
LOXAHATCHEE, FL 33470

MS. KATHERINE BOYD WOOTEN
14608 82ND LANE NORTH
LOXAHATCHEE, FL 33470

SGT PATRICK S. WRIGHT #5932

MS. DEBBIE ZEE
TO BE PROVIDED

OFC. HENRY L. ZUBACK JR. #1850
PALM BEACH COUNTY SHERIFF'S OFFICE
3228 GUN CLUB ROAD
WEST PALM BEACH, FL 33406

WITNESS CATEGORY B

MS. DEBBIE BITNER

TO BE PROVIDED

MS. SUE CLARK
TO BE PROVIDED

MS. SHIRLEY CUTCHER
TO BE PROVIDED

MS. MAY LIN

CHRIS MADAUGH
TO BE PROVIDED

MR. PAUL MURPHY
TO BE PROVIDED

MR. JOHN ROSS
TO BE PROVIDED

MR. LOU SESSA

MR. JOHN SUMPTER
TO BE PROVIDED

WITNESS CATEGORY C

CLERK OF COURT - PALM BEACH COUNTY
ATTN: FELONY CLERK
205 NORTH DIXIE HIGHWAY
WEST PALM BEACH, FL 33401

NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY

WASHINGTON COUNTY GENERAL DISTRICT COURT
ATTN: MELISSA BLEVINS
191 EAST MAIN STREET
ABINGDON, VA 24210

FELONY DIVISION EVIDENCE CHECKLIST

A. Witness(es)' statements:

- a. Ronald Carter: 09/26/2017 (Det. William Springer)
- b. Donald Carter:
- c. Jeffrey Libby
- d. Sharon Curtis
- e. Regina Albaro: (06/21/1991)
- f. John W. Bush (07/17/1991)
- g. Frank Cantor (06/11/1989)
- h. Joyce Clayton (06/17/1991)
- i. Mary DeFrancisco ((06/21/1991)
- j. Paul Etzel (07/11/1991)
- k. Michael Warren
- l. Jean Ann Pratt: (06/27/1991)
- m. Joseph Ahrens (05/02/1991)
- n. Wendell Pratt (06/27/1991)
- o. Deborah Small (06/19/1991) (06/26/1991)
- p. David Swift (10/01/1990)
- q. Dinah Rosales (06/19/1991) (06/20/1991)
- r. Richard Keen (07/21/1991)
- s. Patrick Kip (07/17/1991)
- t. Mindy Perez (06/27/1991)
- u. Mary Ruth Sheltra (07/19/1991)

- v. Robert Sheltra (07/19/1991)
- w. Andrew Siegel (07/17/1991)
- x. Mindy Pratt
- y. Dr. Hansrote
- z. Mr. Brewster
- aa. John Gerle
- bb. Richard Keen
- cc. Sandra Sargent
- dd. Paul Plowden
- ee. Jerome Oenbrink
- ff. Debra Rehker (06/01/90)
- gg. Jamie Twing (06/01/90)
- hh. Janie Fitton (06/04/90)
- ii. Mary Moomaw (06/05/90)
- jj. Gene Moomaw (06/05/90)
- kk. Linda Davis (06/05/90)
- ll. J.P. Sasser (06/06/90)
- mm. Ray Hawk (06/06/90)
- nn. Suzanne Martin
- oo. Della Rainone
- pp. Pat Ward
- qq. Susan Hudacek
- rr. Richard Williams
- ss. John Moran

- tt. Diane Love
- uu. Bobby Joe Carter
- vv. Claude Poitras
- ww. Deborah Atnip
- xx. Holly Weaver

B. Statement(s) made by the Defendant:

- a. Statement by Defendant (05/27/1900)
- b. Statement by Defendant (05/30/1990)
- c. Statement by Defendant (09/26/2017)

C. Statement(s) made by Co-defendant(s): None

D. Transcript(s) of Grand Jury testimony of Defendant (if any): None

**E. Tangible papers of objects that were obtained from or belonged to the Defendant:
None**

F. Confidential informant information (if any): None

G. Electronic surveillance, including wiretapping of the Defendant (if any): None

H. Search and seizure items (and documents relating thereto):

- a. Inventory and Return: Sheila Keen Apartment: (ALL ITEMS LISTED IN THE INVENTORY AND RETURN)
- b. Black Lace Up Shoes
- c. T Shirts
- d. Inventory and Return: Sheila Keen Hair

I. Reports or statements of experts:

- a. ME Report (James Benz)
- b. Surrogate ME Report: TO BE PROVIDED IF COMPLETED
- c. Firearms Report

- d. DNA Report
- e. FBI Forensic Report
- f. Latent Print Report (Parsons): 06/01/2016

J. Tangible papers or objects that the prosecuting attorney intends to use in the hearing or trial that were not obtained from the defendant or did not belong to the defendant:

- a. Photos of crime scene
- b. Photos of Chrysler LeBaron
- c. Autopsy Photos
- d. Photos of Marlene Warren funeral
- e. Photos of group of people in Legend's Bar and Grill
- f. Photo array by Deborah Small
- g. Photo array by Dinah Rosales
- h. PBSO Offense Report:
- i. Supplement 1 (Davie)
- j. Supplement 2 (Smith)
- k. Supplement 3 (Baker)
- l. Supplement 4 (Stormes)
- m. Supplement 5 (Evans)
- n. Supplement 6 (Werring)
- o. Supplement 7 (Easton)
- p. Supplement 8 (Harrison)
- q. Supplement 9 (Griffith)
- r. Supplement 10 (Mullins)
- s. Supplement 11 (Mullins)

- t. Supplement 12 (Stormes)
- u. Supplement 13 (Free)
- v. Supplement 14 (Free)
- w. Supplement 15 (Kelley)
- x. Supplement 16 (Williams)
- y. Supplement 17 (Williams)
- z. Supplement 18 (Kelley)
- aa. Supplement 19 (Williams)
- bb. Supplement 20 (Harrison)
- cc. Supplement 21 (Williams)
- dd. Supplement 22 (Kelley)
- ee. Supplement 23 (Williams)
- ff. Supplement 24 (Mullins)
- gg. Supplement 25 (Williams)
- hh. Supplement 26 (Williams)
- ii. Supplement 27 (Williams)
- jj. Supplement 28 (Williams)
- kk. Supplement 29 (Williams)
- ll. Supplement 30 (Mullins)
- mm. Supplement 31 (Williams)
- nn. Supplement 32 (Williams)
- oo. Supplement 33 (Williams)
- pp. Supplement 34 (Williams)
- qq. Supplement 35 (Williams)

- rr. Supplement 36 (Mullins)
- ss. Supplement 37 (Williams)
- tt. Supplement 38 (Mullins)
- uu. Supplement 39 (Mullins)
- vv. Supplement 40 (Williams)
- ww. Supplement 41 (Williams)
- xx. Supplement 42 (Piazza)
- yy. Supplement 43 (Robinson)
- zz. Supplement 44 (Mullins)
- aaa. Supplement 45 (Springer)
- bbb. Supplement 46 (Wright)
- ccc. Supplement 47 (Wright)
- ddd. Supplement 48 (Carney)
- eee. Supplement 49 (Wright)
- fff. Supplement 50 (Wright)
- ggg. Supplement 51 (Springer)
- hhh. Supplement 52 (Lentini)
- iii. Supplement 53 (Springer)
- jjj. Supplement 54 (McCann)
- kkk. Supplement 55 (McCann)
- lll. Supplement 56 (Tomas)
- mmm. Supplement 57 (Springer)
- nnn. Supplement 58 (Springer)
- ooo. Supplement 59 (McCann)

ppp. Firearms Report (O'Rourke)

qqq. Consent to Search: Michael Warren

rrr. Consent to Search: Michelle Britton

sss. Bad Check and Theft Reports

ttt. Financial Statements

uuu. Statements of witnesses

vvv. Stolen Car Reports

www. Prior convictions

xxx. Pen Register Installation Orders

yyy. Tow Receipt

zzz. Rental Property Documentation

aaaa. Property Receipts

bbbb. Receipt from Publix: Time stamp of 09:22.

cccc. Receipt

dddd. Business Card

eeee. Sample Price Sticker

ffff. Pink in color night gown with BLS

gggg. White metal spoon with BLS

hhhh. Basket of multicolored flowers

iiii. White rag with BLS

jjjj. Pink multicolored rug with BLS

kkkk. Yellow metal rings

llll. Yellow metal ear ring

mmmm. Yellow plastic barrettes

nnnn. Consent to search: 15470 Take Off Place. Michael Warren

oooo. Winston Cigarette Butt

pppp. Cloth glove

qqqq. Yellow metal ear ring

rrrr. White plastic comb

ssss. Balloons

tttt. Photographs of latent lifts from balloons (CD)

uuuu. Yellow metal watch

vvvv. Commo tapes

wwww. Signed consent to search from Michelle Birtton re: her 88 Chrysler
LeBaron.

xxxx. One projectile recovered from the victim

yyyy. U.S. Currency (\$1700.00)

zzzz. Red Check Book

aaaaa. Visa Card

bbbbb. Blue handled knife

ccccc. Black handled knife

dddd. White radio tape

eeee. Ice scrapers

ffff. Projectile

ggggg. Hair samples from Marlene Warren.

hhhhh. Biological Samples from the victim Marlene Warren

iiii. Latent lift cards

jjjj. Morgue Prints

kkkkk. Consent to search Debra Ann Zee: Payless Rent A Car

lllll. Jordache Levi Jacket with BLS
mmmmm. Clown Makeup
nnnnn. Plastic Bag containing receipt #39488
ooooo. Bob Kelly clown kit
ppppp. Vacuum bag
qqqqq. Hair like fibers from LeBaron
rrrrr. Hair like fibers from Defendant's shoes
sssss. Key belonging to Sheila Keen
ttttt. Orange clown wig
uuuuu. White make up (Bob Kelly)
vvvvv. One Pink Bag
wwwww. Costume Catalog
xxxxx. Sales Receipt for \$68.37
yyyyy. Florida Tag YMI 32G
zzzzz. White Trash Bag containing napkins and trash
aaaaa. 3 pairs of black high top sneakers
bbbbb. Black glove
ccccc. Denim jacket
ddddd. 12 T Shirts
eeeee. 2 small leaves from LeBaron
fffff. Fibers from LeBaron
ggggg. White plastic straw wrapper
hhhhh. Bright pink colored lighter
iiiiii. Wrigley's gum wrapper

jjjjj. Rental papers

kkkkkk. Kleenex Tissues

lllll. Florida Tag YQB-94M

mmmmmm. Brown paper Publix bag

nnnnn. Pieces of sticker

ooooo. Video of Marlene Warren funeral

pppppp. Orange wig and tag

qqqqqq. Red foam clown nose

rrrrr. Orange/Yellow synthetic fibers.

sssss. Pieces of red carpet fibers from LeBaron

ttttt. 1988-89 Southern Bell Telephone Book

uuuuuu. Clown Costume from Spotlight

vvvvvv. Smith & Wesson MD 36 J213524

wwwww. Raven Arms SN 717931

xxxxxx. .38 caliber projectile

yyyyyy. WJNO interview with Mike Warren, Joey Ahrens, and John Wilbur

zzzzzz. Miranda Card: Bahr

aaaaaaa. Notes written by Jeff Libby

bbbbbbb. News article of Bahr

ccccccc. Prison documents (Bahr)

ddddddd. Report: University of Florida: Institute of Food and Agricultural Sciences:
David Hall

eeeeeee. Payless Rental Agreement

ffffff. In Car Video with Sheila Keen/Det. Chris Hazelwood

ggggggg. Sheila Keen Warren Jail Phone Calls (Virginia)

hhhhhhh. Department of Corrections Records for Michael Warren

iiiiiii. Visitation and Emails: Washington County Jail: Keen Warren

jjjjjj. PBSO LIMS Report and ANY AND ALL EVIDENCE LISTED IN THE REPORT.

kkkkkkk. Any and All items of evidence or property described or mentioned in any offense report, any police report or any crime scene or lab report.

K. Tangible paper, objects or substances in the possession of law enforcement that could be tested for DNA:

- a. White Plastic Comb
- b. Red Plastic Spoon
- c. Red Plastic Fork
- d. Red Plastic Knife
- e. Winston Cigarette Butt
- f. Bob Kelley Clown Makeup Kit
- g. Latent print lifts
- h. Clown Wig
- i. Hairs from LeBaron

Hairs from Sheila Keen

Copies of all recordings are to be obtained from the Police Department.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED by the undersigned that a true and correct copy of the foregoing Discovery Exhibit (Answer to Notice of Discovery); Demand for Reciprocal Discovery Exhibit; and Demand for Notice of Alibi has been furnished by E-SERVICE to the Attorney for the Defendant, Richard Lubin at rich@lubinlaw.com on this, the 12th day of December, 2017.

/s/



By: _____
REID SCOTT
Assistant State Attorney
Florida Bar No. 0028413