

IN THE SUPREME COURT OF FLORIDA

IN RE: STANDARD JURY INSTRUCTIONS IN CRIMINAL CASES

**PROPOSAL TO SUPPLEMENT STANDARD CRIMINAL JURY INSTRUCTION 8.7(b),
AGGRAVATED STALKING (INJUNCTION ENTERED), REGARDING ALLEGED
CYBERSTALKING**

Submitted by:

Ginna Patricia Arevalo
Interested Person

TO THE SUPREME COURT COMMITTEE ON STANDARD JURY INSTRUCTIONS IN
CRIMINAL CASES:

I respectfully propose an amendment to Standard Criminal Jury Instruction 8.7(b) to clarify the application of Florida's cyberstalking statute when the alleged conduct consists of electronic communications made after entry of an injunction.

I was the defendant in a criminal case involving alleged aggravated stalking. The prosecution was terminated by a *nolle prosequi*. My experience raised concerns about evaluating electronic communications without access to earlier communications that may explain their context or purpose.

I. ISSUE PRESENTED

Whether Instruction 8.7(b) should clarify that, when the alleged conduct involves cyberstalking:

1. Proof of prohibited contact or an injunction violation does not automatically establish every applicable statutory requirement.
2. The jury must consider the statutory definition of cyberstalking under section 784.048(1)(d), Florida Statutes, including the requirement concerning legitimate purpose.

3. The content, context, circumstances, and purpose of the alleged communications may be considered to the extent supported by admitted evidence.

4. Jurors must not speculate about communications that are unavailable or were not admitted into evidence.

5. The number or frequency of communications does not eliminate the State's burden to prove the applicable statutory requirements beyond a reasonable doubt.

II. STATUTORY REQUIREMENTS AND PROPOSED CLARIFICATION

Section 784.048(1)(d), Florida Statutes, defines cyberstalking to include specified electronic communications or conduct involving another person's online accounts or connected home electronic systems that causes substantial emotional distress and serves no legitimate purpose.

Section 784.048(4) addresses aggravated stalking following an injunction or other court-imposed prohibition of conduct. Instruction 8.7(b) identifies the elements applicable to that offense.

The Committee should consider whether the instruction adequately explains the relationship between those provisions when the alleged conduct consists of electronic communications.

An injunction may prohibit contact regardless of its asserted purpose. However, proof of prohibited contact should not be treated as automatically resolving every distinct statutory requirement applicable to the charged offense.

The clarification would not excuse prohibited contact or suggest that a defendant may disregard an injunction. It would ensure that jurors evaluate the applicable statutory requirements under the law and evidence presented at trial.

III. PRIOR COMMUNICATIONS AND JURY INSTRUCTION ADEQUACY

In *Sinclair v. State*, 657 So. 2d 1138, 1141 (Fla. 1995), the Florida Supreme Court addressed the limits of criminal discovery obligations concerning information outside the State's actual or constructive possession.

Although *Sinclair* did not specifically address cyberstalking or missing electronic communications, it provides relevant background concerning the limits of discovery obligations. Discovery, preservation, and admissibility are distinct issues.

Earlier communications from a related domestic-relations proceeding may provide context for later messages. When those communications are unavailable or not admitted into evidence, the jury may lack information relevant to evaluating the later communications.

My case, identified below, illustrates the concern motivating this proposal. I do not suggest that the dismissal established a discovery violation or resolved the merits of the allegations. Rather, my experience highlights the importance of ensuring that jurors decide cases based on admitted evidence, without speculating about missing communications. My case lasted more than three years, and I spent six months in jail awaiting hospitalization for a diagnosis that might have been resolved had the prior communications existed. Most importantly, every attorney I consulted was reluctant to proceed to trial without the earlier communications needed to provide context for the later ones. I believe clearer jury instructions could give defense counsel greater confidence to litigate cyberstalking cases, allowing courts to address unresolved legal issues on their merits and potentially establish important precedent.

Related Criminal Case: *State v. Arevalo*, No. 2022-CF-005234, in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida, terminated by nolle prosequi on July 31, 2025. Supporting exhibits include the Notice of Nolle Prosequi, Order Denying Motion to

Compel Electronic Communications, State's Response to Defendant's Motion to Compel Electronic Communications, Defendant's Motion to Compel Electronic Communications, and Statement of Particulars.

A supplemental jury instruction should clarify that jurors must neither presume that missing communications establish a legitimate purpose nor presume that their absence disproves one. It should explain how the absence of such communications may be considered in evaluating the evidence, while emphasizing that the State must prove every applicable element beyond a reasonable doubt.

IV. APPLICATION TO MODERN DIGITAL COMMUNICATIONS

Electronic communications serve family, personal, professional, legal, and informational purposes, and their meaning may depend on their content and surrounding circumstances. Florida's stalking statute has evolved to address cyberstalking. See ch. 2003-23, Laws of Florida. In *Riley v. California*, 573 U.S. 373, 393 (2014), and *Carpenter v. United States*, 585 U.S. 296, 309 (2018), the United States Supreme Court recognized distinctive considerations arising from modern digital technology. Although neither case addresses Florida's cyberstalking statute, both underscore the importance of interpreting and applying the law in light of the evolving digital landscape.

The number and frequency of communications may be relevant to establishing a course of conduct but should not substitute for evaluating the applicable statutory requirements, including whether the alleged conduct served no legitimate purpose. The proposed clarification would help jurors evaluate the evidence without treating the volume of communications as dispositive.

V. REQUEST FOR CONSIDERATION OF A SUPPLEMENTAL JURY INSTRUCTION

I respectfully request that the Committee consider whether Instruction 8.7(b) would benefit from additional guidance addressing alleged cyberstalking, including the evaluation of electronic communications, their context and purpose, and the State's burden to prove every applicable statutory element beyond a reasonable doubt.

I defer to the Committee's judgment regarding whether an amendment is warranted and, if so, its appropriate wording and placement.

VI. CONCLUSION

This proposal respectfully asks the Committee to consider whether Standard Criminal Jury Instruction 8.7(b) should provide additional guidance when aggravated stalking allegations involve cybercommunications. The concerns include distinguishing an injunction violation from proof of the applicable statutory requirements; considering the statutory definition of cyberstalking, including the legitimate-purpose requirement; evaluating communications in their evidentiary context; avoiding speculation about communications unavailable or not admitted into evidence; and ensuring that the number or frequency of communications does not diminish the State's burden of proof beyond a reasonable doubt.

I respectfully defer to the Committee's judgment as to whether clarification is warranted and, if so, the appropriate wording and placement of any amendment.

Respectfully submitted,
/s/
Ginna Patricia Arevalo
Interested Person
Email: ginnaparevalo@gmail.com
Telephone: 407-800-2614

Date: October 15, 2026

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND FOR
ORANGE COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO: 48-2022-CF-005234-O

vs.

DIVISION: 10

GINNA PATRICIA AREVALO
_____ /

NOLLE PROSEQUI

THE STATE OF FLORIDA, by the undersigned State Attorney, enters a Nolle Prosequi
in the above-entitled action as to:

Count 1. AGGRAVATED STALKING AFTER AN INJUNCTION (F3)

I CERTIFY that a copy hereof has been furnished to GINNA PATRICIA AREVALO,
3601 NE 170th St, Apt 205, North Miami Beach, FL 33160 by mail on this 31st day of July,
2025.

MONIQUE H. WORRELL, State Attorney
Ninth Judicial Circuit of Florida



By: _____

Ryan Whitaker
Assistant State Attorney
Florida Bar # 111814
Division10@SAO9.org
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Orlando, FL 32802-1673
407-836-2192

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 2022-CF-005234-A-O

DIVISION 10

STATE OF FLORIDA

Plaintiff,

vs.

GINNA PATRICIA AREVALO

Defendant.

**ORDER DENYING DEFENDANT'S MOTION TO COMPEL AND FOR AN ORDER
DIRECTING THE STATE ATTORNEY TO FILE A MEMORANDUM OF LAW**

THIS CAUSE, having come before the Court for hearing on June 20, 2025 on Defendant's Motion to Compel and for an Order Directing the State Attorney to File a Memorandum of Law filed on May 16, 2025 (the "Motion") and the Court having reviewed the Motion and associated memoranda, having heard argument, and being otherwise duly advised in the premises, hereby

ORDERS AND ADJUDGES AS FOLLOWS:

1. Defendant seeks to (a) compel production of communications to or from a certain phone number, and (b) require the State to submit a legal memorandum addressing *Sinclair v. State*, 657 So. 2d 1138 (Fla. 1995).

2. As to Defendant's request to compel a further production of communications, the State contends that it does not have possession or control of the communication involving the subject phone number. The State maintains that, while the communications were sent to the

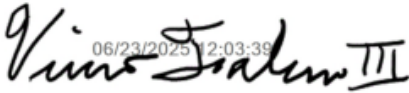
alleged victim in the case, it does not have the requested communications and has produced all communications within its possession or control from April 20, 2022 to May 4, 2022 that are at issue in the charge in the case. Although the State has seized a phone in the other pending case against Defendant, it cannot access that phone because of password protection, and Defendant maintains that she had a different phone at the time the communications in question were sent.

3. The State's discovery obligation extends only to information within its "possession or control." Fla. R. Crim. P. 3.220(b)(1); *see Sinclair*, 657 So. 2d at 1141 ("[N]one of the rules of criminal procedure relating to discovery require the State to disclose information which is not within the State's actual or constructive possession."). Defendant has not shown that the State has failed to produce information that is in its possession or control and within its discovery obligation.

4. Defendant has not shown any legal basis for requiring the State to prepare and submit a further memorandum regarding the *Sinclair* decision.

5. For the foregoing reasons, the Motion is hereby **DENIED**.

DONE AND ORDERED in Chambers, at Orlando, Orange County, Florida this 23rd day of June, 2025.


eSigned by Vincent Falcone III 06/23/2025 12:03:39 ez0sko5U
Vincent Falcone III
Circuit Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 23rd day of June, 2025 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal System.

Sub Judicial Assistant to Judge Vincent Falcone III

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND FOR
ORANGE COUNTY, FLORIDA

STATE OF FLORIDA

Plaintiff,

vs.

CASE NO: 48-2022-CF-005234-O

DIVISION: 10

GINNA PATRICIA AREVALO

Defendant.

**STATE'S RESPONSE TO DEFENDANT'S MOTION TO COMPEL AND FOR AN
ORDER DIRECTING THE STATE ATTORNEY TO FILE A MEMORANDUM OF
LAW**

COMES NOW, the State of Florida and requests this Honorable Court to deny the Defendant's Motion to Compel and for an Order Directing the State Attorney to File a Memorandum of Law. In support thereof, the State would show that:

1. The Defendant filed the instant motion on May 15, 2025. In said motion, she indicates that on June 16, 2022, she filed a invoked her right to discovery pursuant to Fla. R. Crim P. 3.220. In that document, she specifically requested "all messages sent and received from/to" (407) 802-8084.
2. On July 20, 2022, the Court heard argument regarding said request. During that argument, the Assistant State Attorney cited *Sinclair v. State*, 657 So.2d 1138 (1995).
3. Discovery was provided. Initial and supplemental discovery was provided in October 2022 and a courtesy copy was forwarded in January 2024. Supplemental discovery was provided in May 2025.
4. Notwithstanding the fact that this issue was previously argued, the Defendant filed the instant motion. In this motion, the Defendant acknowledged that she received discovery, but states that the discovery received does not contain any messages sent or received from the aforementioned phone number. Rather, to contains messages sent from a different phone number. She states that (407) 802-8084 "was her personal cell number that she used to communicate with [REDACTED] for many years and was the only number she provided to [REDACTED] since the year of 2017 when she started working with him..." Defendant's Motion, p. 4. She claims that this missing evidence "contains exculpatory evidence which would be necessary to the defense". *Id.*
5. Further, the Defendant requests this Court require the State to provide a memorandum of law as to the *Sinclair* case, alleging that the "State Attorney continues to cause delays to avoid explaining the case law that the State Attorney said was going to be cited at the June 20, 2022, discovery hearing." *Id.*

6. As to the second point, it is the State's position that the *Sinclair* case speaks for itself. It states: "We agree with the trial court that none of the rules of criminal procedure relating to discovery require the State to disclose information which is not within the State's actual or constructive possession." *Sinclair*, at 1141. The State is not "causing a delay" by not explaining something that is clear from the plain language of the case.
7. Next, going back to the first point, the Defendant is, apparently, requesting this Court order the State to produce *all* text messages sent/received from the Defendant's *personal* cell phone number. The State does not have this information and it is unclear why the Defendant would want the State to *have* or *obtain* every message or communication sent or received from her *personal* cell phone. It is the State's position that this request is overbroad and unworkable and would, by definition, include irrelevant information and messages sent and received by individuals unrelated to the instant case.
8. The State does, however, acknowledge that the Orange County Sheriff's Office did collect and seize a cell phone from the Defendant, which is currently held in property. Undersigned is unaware of what phone number is assigned to that phone. According to Detective Belardes of the Orange County Sheriff's Office, an attempt to retrieve information from that phone was unsuccessful, because the device is passcode protected. Should the Defendant provide the passcode for that phone, Det. Belardes is willing to send the phone for forensic examination. The State will, of course, provide any results of that forensic examination in supplemental discovery, once it is received.
9. The Defendant cites no statute, rule, or case that stands for the proposition that the State must obtain the information she is requesting. The State has disclosed all messages and voicemails in its possession for the relevant time period (April 20, 2022-May 4, 2022). The Defendant, however, claims that there is other evidence that "contains exculpatory evidence". The Defendant does not cite to the case; however, she is correct that *Brady v. Maryland* requires the State to disclose exculpatory information. 373 U.S. 83 (1963). However, that information must be within the State's "possession or control". *Mordenti v. State*, 894 So.2d 161 (Fla. 2004). Even if the phone mentioned in paragraph 8, above, contains the requested information, it is the State's position that information is not in its constructive possession, because the device is passcode protected and law enforcement has been unable to retrieve any information from that phone. Should the Defendant choose to provide law enforcement with that passcode, Det. Belardes will send that phone for forensic examination and all records will be provided in discovery once they are received. However, absent that, nothing in the Rules of Criminal Procedure require the State to disclose information not within its actual or constructive possession. *Wilcox v. State*, 143 So.3d 359, 376 (Fla. 2014); *Sinclair*, at 1141.
10. Further, while the State does have an obligation to provide exculpatory information pursuant to *Brady*, there has been no showing, except for the Defendant's assertion, that this information is, in fact, exculpatory. Further, it is not a *Brady* violation if the Defense can obtain that information through due diligence. "There is no *Brady* violation if the information is equally accessible to the defense and the prosecution, or where the defense either had the information or could have obtained it through the

exercise of reasonable diligence.” *Freeman v. State*, 761 So.2d 1055 (Fla. 2000) (citing *Provenzano v. State*, 616 So.2d 428, 430 (Fla. 1993)). Because this phone number is the *Defendant’s* phone number, presumably she is already in possession of these messages. And, if she is not, she can likely obtain them by simply requesting them directly from her phone provider and/or WhatsApp. In fact, the State contends that this information is likely *easier* for her to obtain, as the “owner” of the phone and/or the WhatsApp account, than it would be for the State, as it would require the State to issue a subpoena duces tecum to either the cell phone provider or Meta.

WHEREFORE, for the reasons asserted above, the State of Florida respectfully requests this Honorable court deny the Defendant’s Motion.

I CERTIFY that a copy hereof has been furnished to GINNA PATRICIA AREVALO, 3601 NE 170th St, Apt 205, North Miami Beach, FL 33160 ginnaparevalo@gmail.com by mail on this 18th day of June, 2025.



Joanna M. Sandstrom
Assistant State Attorney
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IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA

Case No. 2022-CF-005234-O
Division: 10

vs.

GINNA P. AREVALO

Defendant,

_____ /

**MOTION TO COMPEL AND FOR AN ORDER DIRECTING
THE STATE ATTORNEY TO FILE A MEMORANDUM OF LAW**

COMES NOW, Ginna Arevalo (hereinafter, Ms. Arevalo), pursuant to Rule 3.220, Florida Rules of Criminal Procedure, and files this Motion to Compel and as grounds in support thereof would show unto the Court as follows:

1. On June 16, 2022, Ms. Arevalo entered a Notice of Appearance in exercise of her right of self-representation.
2. On June 16, 2022, Ms. Arevalo also served the State of Florida with a Notice of Discovery pursuant to Rule 3.220, Florida Rules of Criminal Procedure, specifically requesting "all messages sent and received from/to the following numbers [...] (407) 802-8084 [...]."
3. Following this notice, Ms. Arevalo contacted the State Attorney's office via telephone to discuss her discovery demand but was informed via email by an assistant State Attorney that they could not communicate directly because she was representing herself.
4. Because the State Attorney and Ms. Arevalo could not communicate directly, they requested this Court to conduct a discovery status conference, which was scheduled for July 20, 2022.

5. Few hours prior the discovery status conference, an assistant State Attorney sent an email to this Court and Ms. Arevalo stating, “[t]his is the case law State will be citing regarding the Defense’s discovery request. [The State Attorney] will also provide this Court] with a printed copy tomorrow morning.”

6. On July 20, 2022, the State Attorney argued that the cybercommunications that Ms. Arevalo had requested that included the messages from/to the (407)802-8084 cell number and the evidence to prove the authenticity of all cybercommunications was irrelevant, but did not make any reference whatsoever to the “case law State [would] be citing regarding the Defense’s discovery request” that the State Attorney allegedly provided to this Court.

7. At said hearing, a state prosecutor also argued that Ms. Arevalo should amend the Notice of Discovery to protect Daniel Newlin; and thus, that same day, Ms. Arevalo filed a corrected Notice of Discovery and requested again “all messages sent and received from/to the following numbers [...] (407) 802-8084 [...].”

8. On June 20, 2022, Ms. Arevalo also filed with this Court the State Attorney’s correspondence that the State Attorney had sent to this Court and Ms. Arevalo, attaching said case law and reminding this Court that at their discovery status hearing, the State Attorney had not explained the case law that the State Attorney had said it “[would] be citing regarding the Defense’s discovery request” that the State Attorney allegedly provided to this Court. **(Exhibit A)**

9. Between August of 2022 and October of 2022, the focus of this case shifted to competency matters.

10. On October 13, 2022, Judge Tarlika Navarro recused herself and this case was reassigned to Judge Mark Blechman.

11. On October 20, 2022, Judge Mark Blechman ordered Ms. Arevalo to retain private counsel, and her counsel stipulated to a competency evaluation that Ms. Arevalo had opposed to.

12. Between November of 2022 and May of 2023, Ms. Arevalo was incarcerated, awaiting to be hospitalized until Judge Mark Blechman rescinded and cancelled his own Order on May 5, 2023.

13. On May 15, 2023, this Court accepted Ms. Arevalo's private counsel Motion to Withdraw.

14. Between May 15, 2023, and July 21, 2023 (date when this Court removed Ms. Arevalo from the case and appointed the public defender to represent her), Ms. Arevalo requested the State Attorney via email to disclose "all messages sent and received from/to the following numbers [...] (407) 802-8084 [...]."

15. It is unknown if the public defender also requested said messages between July of 2023 and March of 2024, while Ms. Arevalo was competent to stand trial (on March 22, 2024, Ms. Arevalo met a defense's competency evaluator who found her incompetent to stand trial).

16. Between April of 2024 and March of 2025, Ms. Arevalo received legal training to be reevaluated for competency until she was found to be competent to stand trial in March of 2025.

17. On April 29, 2025, this Court conducted a Faretta inquiry and found that Ms. Arevalo is competent of self-representation.

18. On May 2, 2025, Ms. Arevalo sent a renewed demand letter to the State Attorney requesting once again these messages.

19. On May 5, 2025, the State Attorney responded that all discovery had ben already disclosed.

20. The discovery that Ms. Arevalo received does not contain any “messages sent and received from/to the following numbers [...] (407) 802-8084 [...]” even though this is the personal cell number she used to communicate with [REDACTED] (Ms. Arevalo has evidence that shows that the (407) 802-8084 was her personal cell number that she used to communicate with [REDACTED] for many years and was the only number she provided to [REDACTED] since the year of 2017 when she started working with him in his law firm Dan Newlin Injury Attorneys).

21. The state prosecutor produced a word document that contains a transcript of the messages that Ms. Arevalo allegedly sent to [REDACTED] using her “work cell phone number” (407) 800-2614, starting March 3, 2022, that contains pertinent information to the charges as the State intends to use this material as evidence at trial. **Ms. Arevalo does not admit sending any of these messages**, but a quick reading of the first message that was transcribed in this document shows that this is NOT Ms. Arevalo’s personal cell number, and that Ms. Arevalo and [REDACTED] used another number to communicate with each other. **This missing evidence contains exculpatory evidence which would be necessary to the defense.**

22. The State Attorney continues to cause delays to avoid explaining the case law that the State Attorney said was going to be cited at the June 20, 2022, discovery hearing.

WHEREFORE, Ms. Arevalo respectfully requests this Honorable Court to grant her Motion to Compel and for an Order Directing the State Attorney to file a Memorandum of Law as to *Sinclair v. State*, 657 So.2d 1138 (1995) that the State Attorney submitted to this Court on June 19, 2022, to deny Ms. Arevalo’s discovery demand.

Respectfully submitted,

s
Ginna Arevalo
Defendant
3601 NE 170th St. #205

NoMi Beach, FL 33160
Telephone: 407-800-2614
ginnaparevalo@gmail.com

CERTIFICATE OF SERVICE

I certify that the foregoing has been furnished via e-filing to the State Attorney and the Court, on this 16th day of May, 2025.

s
Ginna Arevalo

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY,
FLORIDA

Case No. 48-2022-CF-005234-O

Division: 19

STATE OF FLORIDA

VS.

GINNA PATRICIA AREVALO

Defendant,
_____ /

NOTICE OF FILING

Please take notice that the Defendant's Exhibit mentioned at the July 20, 2022, Status Hearing is being filed, as well as Defendant's email requesting a hearing on her Motion for a Statement of Particulars and the *Sinclair v. State* case that the State sent to the Defendant and the Court to be discussed at said Status Hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-service via the Florida Court E-Filing Portal, to the Clerk of Court, the Office of the State Attorney, and David A. Webster, Esq., attorney for the alleged victim, this 20th Day of June of 2022.

Respectfully submitted,

/s/ Ginna Arevalo

Ginna Arevalo
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Defendant
ginna@horizonlegal.com
ginnaparevalo@gmail.com

From: Ginna Arevalo <ginnaparevalo@gmail.com>
Date: Wednesday, July 20, 2022 at 11:51 AM
To: Brown, Cindy (CTADMIN) <ctjacb1@ocnjcc.org>
Cc: Zeglen, Melissa <mzeglen@sao9.org>, dwebsterlaw@gmail.com
<dwebsterlaw@gmail.com>
Subject: Re: Sinclair v. State: Defendant: AREVALO, GINNA - Case No: 48-2022-CF-005234-O,
Agency Case No: OCSO 22-028323

Ms. Brown,

This follows the email that you and I received yesterday, July 19, 2022, at 4:26 from the State related to the Status Conference that was scheduled for today, July 20, 2022, at 9:00 am. The Sinclair v. State case was not discussed at said hearing, but it appears that the State does not have additional discovery, responsive to my Notice of Discovery and Demand for Statement of Particulars dated June 16, 2022. I have filed the attached Motion for a Statement of Particulars and would like to know the Judge's availability to hear said Motion. Please advise.

I am adding the victim's attorney to this email chain. Thank you everyone.

Best regards,

Ginna

From: Zeglen, Melissa <mzeglen@sao9.org>
Date: Tuesday, July 19, 2022 at 4:26 PM
To: Ginna Arevalo <ginna@horizonlegal.com>, Ginna Arevalo <ginnaparevalo@gmail.com>
Cc: Brown, Cindy (CTADMIN) <ctjacb1@ocnjcc.org>
Subject: FW: Sinclair v. State

Hello All,

This is the case law State will be citing regarding the Defense's Discovery Request. I will also provide Judge Navarro with a printed copy tomorrow morning.

Kindest Regards,

Melissa Zeglen
Assistant State Attorney
Office of Monique H. Worrell
State Attorney, Ninth Judicial Circuit
415 N. Orange Avenue
Orlando, FL 32801

407-836-1105
mzeglen@sao9.org

Please note: Florida has a very broad public records law. All e-mails are kept as a public record. Your e-mail communications, including your e-mail address, may be disclosed to the public and media at any time.

-----Original Message-----

From: Westlaw@westlaw.com <Westlaw@westlaw.com>
Sent: Thursday, July 14, 2022 12:04 PM
To: Zeglen, Melissa <mzeglen@sao9.org>
Subject: Sinclair v. State

melissa zeglen sent you content from Westlaw.
Please see the attached file.

Item: Sinclair v. State
Citation: 657 So.2d 1138
Sent On: Thursday, July 14, 2022
Sent By: melissa zeglen
Client ID: STATE

Note:

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IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND FOR
ORANGE COUNTY, FLORIDA

STATE OF FLORIDA
Plaintiff,

vs.

GINNA PATRICIA AREVALO
Defendant.

CASE NO: 48-2022-CF-005234-O

DIVISION: 10

STATEMENT OF PARTICULARS

THE STATE OF FLORIDA, by the undersigned, pursuant to CrPR 3.140(n) and/or Court Order, furnishes this Statement of Particulars:

As particularly as known to the State Attorney, the place, date and time of commission of the offense charged herein is:

- 1) Place - In Orange County, Florida, via digital and telephonic communications.
- 2) Date and Time –
 - April 20, 2022 between 8:00am and 11:00pm
 - April 21, 2022, between 7:00am and 9:00pm
 - April 26, 2022, between 12:00am and 8:30pm
 - April 27, 2022, between 8:00am and 9:00pm
 - April 29, 2022, between 10:00am and 12:00am
 - April 30, 2022, between 12:00am and 1:30pm
 - May 1, 2022, between 12:00am and 1:30pm
 - May 2, 2022, between 2:30pm and 11:30pm
 - May 3, 2022, between 6:30am and 2:00pm
 - May 4, 2022, between 8:00am and 10:00pm

I CERTIFY that a copy hereof has been furnished to GINNA PATRICIA AREVALO,
3601 NE 170th St, Apt 205, North Miami Beach, FL 33160 ginnaparevalo@gmail.com and by
mail on this 30th day of May, 2025.

MONIQUE H. WORRELL, State Attorney
Ninth Judicial Circuit of Florida



By: _____

Joanna M. Sandstrom
Assistant State Attorney
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