

IN THE CIRCUIT COURT OF THE AND  
17TH JUDICIAL CIRCUIT IN AND  
FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO. 18012713CF10A

vs.

JUDGE: DUFFY

KEIVONNE QUATAE JORDAN,  
Defendant.

**MOTION TO COMPEL DISCOVERY, MOTION TO COMPEL BRADY MATERIAL,  
AND MOTION TO RE-DEPOSE DETECTIVE MARK MORETTI**

COMES NOW the Defendant, KEIVONNE QUATAE JORDAN, by and through the undersigned attorney, pursuant to Rule 3.220, Florida Rules of Criminal Procedure, and moves this Court for an Order compelling the State to comply with the rules of discovery. As grounds for this Motion, Defendant would show:

1. The Defendant was arrested on October 11, 2018.
2. The Defendant is charged with one count of carjacking and one count of aggravated fleeing and eluding at a high speed.
3. The Defendant filed a demand for discovery on October 23, 2018.
4. The State of Florida listed Miramar Police Detective Mark Moretti as a state witness in this case on March 20, 2023.
5. The Defendant filed a previous motion demanding disclosure of Brady on October 23, 2018, and the State of Florida replied with a response indicating they were aware of the continuing duty to provide all materially favorable information in their possession on December 6, 2018.
6. The State response was incorrect and intentionally misleading.

7. In fact, the State of Florida became aware in October of 2022 that Detective Moretti had solicited another police officer, a BSO deputy, to lie for him and to state that the Deputy was present when Detective Moretti was serving a search warrant in another case.
8. It is upon information and belief that the State Attorney's Office was aware of Detective Moretti's misconduct since October 2022 and that this knowledge was pervasive throughout the office and included the State Attorney Harold Pryor, his first chief Gina Faulk, the supervisor of the Public Corruption Unit Chris Killoran, and many, many other members of the State Attorney's Office.
9. Despite being aware of this information for almost a year the State of Florida failed to provide any notice in the instant case.
10. Shockingly, the undersigned first learned of these allegations from the Miami Herald in an article titled "*YNW Melly's lawyers want to remove the Broward prosecutors' office from the case. But why?*" which was published on October 2, 2023.
11. In addition, to the forgoing the deposition of Mark Moretti was conducted on June 23, 2023, at which time the state was still concealing the properly discoverable Brady information.
  - a. It should be noted that Mark Moretti stated in this deposition that in his 25 years of service, he had not "had any IAs, any suspensions, any disciplines, [or] any write-ups."
12. Once the Defendant is provided with the full and complete Brady disclosure, they are requesting leave of the court to re-depose Detective Moretti.
13. As a result of the foregoing the Defendant is requesting the State of Florida to provide the following information:

- a. All material information in the State's possession or control (constructive, which would include the Miramar Police Department files, or actual) that tends to bear upon Detective Moretti's credibility, truthfulness, or bias;
- b. All material evidence or information in the State's possession or control (constructive, which would include the Miramar Police Department files, or actual) that it is probably material and exculpatory regardless of whether such information is deemed to be the work product of the prosecutor or otherwise subject to discovery as a public record;
- c. Any oral, written or recorded statements (which would include email) made by any person(s)(including other State Attorney's) to the police, to the Assistant State Attorney, to a victim advocate or other employee of the Office of the State Attorney, that tends to establish the innocence of Defendant, or that tends to impeach the credibility or contradict the testimony of any witness, specifically to include Detective Moretti, whom the State will call during this case;
- d. Any and every report made to the police that tend to impeach the credibility or contradict the testimony of Detective Moretti or any other witness whom the State will call as a witness during this case;
- e. The names and addresses of witnesses, including Assistant State Attorney's, who might impeach the credibility or contradict the testimony of Detective Moretti or any other witness whom the State intends to call as a witness during this case;
- f. Any information or material that tends to establish the innocence of the Defendant, or impeach the credibility or contradict the testimony of any witness whom the State calls as a witness in this case;

- g. The complete investigative file, including any and all prosecutions, investigations, including internal affairs investigations, or possible prosecutions which are completed, pending or which could be brought against Detective Moretti;
- h. Any and all records and information showing prior misconduct or bad acts committed by the witness;

14. Other grounds to be argued *ore tenus*.

WHEREFORE, Defendant prays the Court will grant this Motion and Order the State to comply with the discovery obligations set forth in Rule 3.220.

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, MITCHELL A CUSTER, at [courtdocs@sao17.state.fl.us](mailto:courtdocs@sao17.state.fl.us), Broward County Courthouse, Fort Lauderdale, Florida, this October 5, 2023.

GORDON WEEKES  
Public Defender  
17th Judicial Circuit

s/ DARIN LEIGH WEISS

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