

IN THE CIRCUIT COURT OF THE
SECOND JUDICIAL CIRCUIT, IN AND
FOR WALTON COUNTY, FLORIDA

CASE NO.: 25CF123
FELONY

STATE OF FLORIDA,
Plaintiff,

v.

JOSEPH JAMES TURNER,
Defendant,

_____ /

RECIPROCAL DISCOVERY SUBMISSION

COMES NOW the Defendant, JOSEPH TURNER, by and through his undersigned Counsel and files this Reciprocal Discovery Submission Pursuant to Fl. R. Cr. P. 3.220:

1. Thomas Dannheisser, Expert Witness in Privacy Laws as applied to Government-issued Devices and Public Records and Public Records Law Violations

c/o Kathleen Bogenschutz, Esq.
521 N. Adams Street
Tallahassee, FL 32309

Will testify to his expert opinion, having served as a County Attorney for an aggregate of twenty-nine (29) years, that there is no right to privacy on information placed on any county-owned device. As codified in the Walton County Employee Handbook, all information and messages sent from or received on a county-owned device are subject to review by the employee's superiors. Further, it is incumbent on someone to review all messages on devices to determine whether they qualify as public records, as many of these messages may.

Curriculum Vitae Summary:

- County Attorney for Santa Rosa County, 1986-2010.
- County Court Judge, Santa Rosa County, 2010-2015.
- Circuit Court Judge, Santa Rosa County, 2015-2021.

- County Attorney for Santa Rosa County, 2021-present.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-filing to the Office of the State Attorney, via the e-filing portal, this 26th day of May, 2026.



KATHLEEN M. BOGENSCHUTZ

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