

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

CASE NO.: 25CF123  
FELONY

STATE OF FLORIDA,  
Plaintiff,

v.

JOSEPH TURNER,  
Defendant,

\_\_\_\_\_ /

**DEFENDANT'S RESPONSE TO WITNESSES' MOTION TO QUASH SUBPOENAS**

COMES NOW the Defendant, by and through his undersigned Counsel and files this Response to two witnesses' (Undersheriff Clark and Sheriff Adkinson) motions to quash subpoenas, and pursuant to Fl. R. Cr. P. 3.220, and shows for Cause as follows:

1. The undersigned was not served with the Motions to Quash Subpoena filed by Ms. Candace Vlahos, WCSO General Counsel.
2. The undersigned was advised by her client that these pleadings had appeared without being served on anyone which ended up being a clerical error with the Office of General Counsel in the Sheriff's Office.
3. Both of these witnesses, Sheriff Adkinson and Undersheriff Clark were listed as Category "A" witnesses by Supervising State Attorney Joshua Mitchell, who has been practicing law for around seventeen (17) years, most, if not all of it, to the understanding of the undersigned, as a prosecutor in this circuit, which should mean he is intimately familiar with Florida Rule of Criminal Procedure 3.220.

4. The assumption the defense is traveling under is that Mr. Mitchell plans to call both of these men as witnesses and believes them to have relevant evidence or else they would not be listed as category "A" fact witnesses.
5. Florida Rule of Criminal Procedure 3.220(h)(1)(A) states:

The defendant may, without leave of court, take the deposition of any witness listed by the prosecutor as a Category A witness or listed by a co-defendant as a witness to be called at a joint trial or hearing.
6. Category "A" witnesses by their very nature are within the realm of being deposed by defense counsel in a felony case (which this is).
7. Every case cited by Ms. Vlahos in her motion(s) to quash is a civil case to the reading of the undersigned.
8. The due process rights of the Defendant to depose a witness listed as "Category A" by a supervising assistant state attorney in a high profile case wherein county officials have been charged with felonies trump any reading or interpretation of the "Apex Doctrine."
9. During their phone call, Ms. Vlahos explained to the undersigned that she was also leaving town for a family funeral and could not be present for the depositions of Sheriff Adkinson or Undersheriff Clark because of this.
10. The undersigned understood, expressed her condolences, and the parties agreed that once Ms. Vlahos reviewed the file and spoke with the Supervising Assistant State Attorney, she may withdraw the motions to quash.
11. If the motion is withdrawn, the parties will mutually agree upon a time to depose both the Sheriff and the Undersheriff and the subpoenas will be served via email.

WHEREFORE the undersigned respectfully requests this Honorable Court strike  
the motions to quash subpoenas filed by the Sheriff's Office

I hereby certify that a true and correct copy of the foregoing has been provided to  
the Office of the State Attorney and the Defendant in this case, this 4<sup>th</sup> day of December,  
2025.



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