

To: Ryan Doyle
Doyle Law Firm
PO Box 459
Fort Myers, FL 33902-0459

Date: 10/27/2025

CC: Clerk of the Court, Lee County
2075 Dr Martin Luther King Jr Blvd
Fort Myers, FL 33901

From: James Daniel Sinclair
844 N Tyndall Pkwy, Box 230
Panama City, FL 32404-9407

REQUEST FOR DOCUMENTS

Defendant: James Daniel Sinclair
Case Number: 18-CF-000148
Date of Conviction: 4/8/2019
Presiding Judge: Frank J Porter

I am currently in the process of continuing litigation in the above styled cause and herby request that you provide the following documents so as to facilitate that purpose:

1. Proof that Lesa Breneman lied under oath to obtain false arrest warrants against Sinclair and Costello
2. Proof that Sinclair was approximately five miles away from the accident when it occurred and was not involved in any way
3. Proof that none of the vehicles passed Sinclair's house, nearly five miles away, on a dead end street, in the opposite direction of travel of the vehicles, at any point during or after the accident
4. Proof from the FDLE that Costello and King's vehicles never made contact at any time
5. Proof that Costello could not have even seen King as they were nowhere near each other at any point
6. Proof that Sinclair's sentence was an illegal sentence and had nothing to do with the false charges he was hit with
7. Proof that no one at FMPD ever asked Sinclair or any of his neighbors for their video, nor did they ask any of the neighbors if they had seen any of the vehicles at any time
8. Proof that Sinclair's DVR was not functioning at the time of the incident and had not functioned for approximately two years prior
 - a. Proof from the manufacturer in writing
 - b. Eye witnesses that were admittedly tampered with by an LCSO Deputy
 - c. Affidavit from Sinclair's neighbor that the DVR would not record and he had been shopping for a new DVR prior to the incident

9. Proof that Sinclair's DVR had absolutely nothing to do with King's motorcycle accident 5 miles West, and was not, nor could be evidence in any way
10. Proof that King's series of three accidents were single vehicle accidents
11. Proof that claims that Breneman spun in the media claiming Sinclair or Costello were drinking and driving were complete fiction
12. Record of Arrests of Adam King and cases of reckless riding and speeding going back to when he first received his license (not from the time it may have been revoked for two years), as well as revocation of license
13. Record of Arrests of Timothy Bernal and cases of reckless riding and speeding going back to when he first received his license
14. Record of Arrests of Shane Romero and cases of reckless riding and speeding going back to when he first received his license
15. Record of Arrests of Joshua Swartwout and cases of reckless riding and speeding going back to when he first received his license
16. Accident reconstruction showing that Adam King and his fellow racing pack riders were riding in excess of 120 mph when Adam King had his single vehicle accident, and his fellow riders fled the scene
17. Identity and vehicle information for all of the riders in Adam King's racing pack including the four other riders who were identified in the 911 call by Timothy Bernal, yet did not show up in any of the other paper work or discovery, including the accident report.
18. The list of all of the fundamental errors in the case
19. Proof of the illegal sentences handed out
20. Proof of the incorrect/illegal score sheets
21. Proof that the FMPD investigator lied to other police officers about Sinclair and Costello to paint a false picture of them. The purpose was to override their strong positive reputations so people would believe the false narrative. Include a copy of Internal Affairs Complaint W002284-071216 filed with Mayor Henderson. Also include the addition to that complaint by Attorney Cordell on 7/12/2016 for the assault committed upon Sinclair by the same investigator while voluntarily at FMPD. Include the proof that the FMPD investigator was aggressively pushing Sinclair to lie about the innocent man, Costello, to make their case easier. Include that part of the reason for the case against Sinclair was retaliation for him refusing to lie about Costello when bullied by the FMPD. Include a copy of the Acting Chief's email stating he was going to ignore the complaint, claiming it was not properly filed. Additionally include a copy of the City of Fort Myers procedures clearly showing this complaint was correctly filed via one of the two options they state by policy.
22. Proof of the series of hate groups started by the investigator at FMPD, the mother of the Habitual Offender who committed insurance fraud against Costello's insurance, and the groupies who followed her for revenge against Costello after he cut them out of his life.
23. Proof that the hate groups started by the persons above posted the addresses of Costello and Sinclair and encouraged violence and harassment against Costello and Sinclair

24. All documents relating to FMPD discussions with the LCSO, including but not limited to Sheriff Mike Scott who asked Sinclair to run for office. The purpose of these meetings appear to be to convince Scott to no longer back Sinclair running for office.
25. Proof that the pack of delinquents and Dodge Ram 1500 with the Camper top never rode past the address DVR covered after they fled the accident scenes the Habitual Offender caused
26. Proof that FMPD never asked for any of the footage from cameras pointed at the address on the dead-end street, immediately or any time after the accident occurred.
27. Proof that the "investigator" lied about the 7 day max recording time for the DVR that had nothing to do with the accident.
28. Proof that FMPD lied under oath fleeing in both arrest and search warrants about the vehicle the motorcycles struck (according to one of the riders in the pack).
29. Proof that it was the pack of motorcycles racing down Colonial Blvd that caused the accidents and not the Dodge Ram 1500 with the camper top.
30. Proof that the pack riders did commit murder when jointly committing crimes in causing the accidents and fleeing the scene, and that their investigator coordinated actions of blaming the Ram 1500 with the Camper Top for the accident, and making other false claims were to keep them from going to prison.
31. Proof that Adam King's pack threatening April Freeman's life did lead to the stress that caused her death. Include a copy of the full police report that April Freeman filed with the Cape Coral Police Department on 7/20/2016 and any prior and subsequent reports of violence from this pack; the FMPD investigator, the mother of the Habitual Offender that caused the accident and fled the scene, and their groupies. To refresh your memory, I believe one of the CCPD report numbers is 16-011637.
32. Proof that the mother of the habitual offender that caused the accident committed insurance fraud, along with her attorney.
33. Proof that the FMPD investigator and the Habitual Offender's stepfather's sister did plant false information in a sworn statement of person who was not witness to the crime, but was listed as an FMPD witness none-the-less. The information such as "fleeing the state" was used intentionally to give to Dave Elias at NBC2/ABC7 to continue to plant false stories about Sinclair and Costello to give the impression they were guilty of something, which they were clearly not.
34. Proof that the FMPD investigator did turn off her camera when speaking to Sinclair's attorney Cordell on 7/14/2016 with the express purpose of not catching the part of the conversation where she agreed to wait the 5 minutes until Cordell arrived at Sinclair's house. The purpose of lying to Cordell and not following through was as the officer intended to paint a false picture to the media. It appears the whole scam was lined up well before the officer arrived at the house.
35. Proof that the FMPD officer did hold Costello and Sinclair inside their respective homes while the officer went outside and spoke to the media. Despite both Costello and Sinclair and their attorneys fully cooperating, the officer made false

statements to the media, including but not limited to claiming she found Sinclair hiding in his closet. In fact Sinclair was on the other side of the door on the phone with his attorney, Cordell, which the officer knew. Sinclair opened the door for the deputies and officers. Instead one story she supposedly told, according to Dave Elias, was that FMPD had to have a SWAT team break down the door.

36. Proof that FMPD ignored the one security recording device in the Sinclair's house, leaving it on the dining room table, and instead took what they believed were Sinclair's main computer and servers, as well as personal documents, none of which were in the search warrant. The obvious purpose was to harm Sinclair's efforts to win the office the Sheriff had asked him to run for.
37. Proof that FMPD's own police union wants to remove the investigator from office.
38. Proof that the state attorney's office did file charges against the FMPD arresting officer for fabricating evidence, bringing false charges, lying under oath and prostitution.
39. Arrest reports of defendants
40. Witness Statements
41. Depositions
42. Any expert testimony, reconstruction and anything along those lines
43. Any and all documents given to defense through the process of discovery.
44. All trust account records regarding the representation of James Daniel Sinclair, and all records of incurred costs and use of advance fee payments.
45. Any information or material provided to attorneys by defendant or other attorneys

To assure that the appropriate motion or petition is timely filed and supporting documents are properly referenced, I request your cooperation in forwarding the aforementioned documents to me as soon as possible. I certify that I was not provided a complete record of all of the case record, and was provided no trust account records from counsel.

Under the Rules Regulating the Florida Bar Rules of Professional Conduct Rule 4-1.16(d), provides in pertinent part: "...surrendering papers and property to which the client is entitled, and refunding any advance payment of fee or expense not earned or incurred"

There is also supporting case law authority of McCaskill v. Dees, 698 So. 2d 678 (Fla 5th DCA 1997) that requires you to surrender those documents that were obtained through the payment of your services via the client (James Sinclair).

Your former Client requests that you surrender any and all documents associated with your representation of him.

Thank you in advance for your assistance regarding this matter.

Respectfully Submitted



James Daniel Sinclair

Certificate of Service

I hereby certify that a true and correct copy of the foregoing REQUEST FOR DOCUMENTS has been sent via US MAIL on this 27th day of October, 2025 to the following:

Ryan Doyle, Doyle Law Firm, PO Box 459, Fort Myers, FL 33902-0459

Clerk of the Court, Lee County, 2075 Dr Martin Luther King Jr Blvd, Fort Myers, FL 33901



James Daniel Sinclair