WARRANT FOR ARREST

IN THE 14th JUDICIAL CIRCUIT COURT IN AND FOR WASHINGTON COUNTY, FLORIDA

IN THE NAME OF THE STATE OF FLORIDA TO ALL AND THE SINGULAR SHERIFFS OF THIS STATE AND TO ALL LAW ENFORCEMENT OFFICERS OF THIS STATE

You are commanded to arrest

Amanda B. Patterson-Fenn W/F DOB

There is probable cause that Amanda B. Patterson-Fenn has committed crimes in Washington County, Florida, including the offense(s) Conspiracy to introduce contraband into a State Correctional Institution (Gang Activity), to wit drugs/tobacco; Conspiracy to introduce contraband into a State Correctional Institution (Gang Activity), to wit cellular telephones; Introduction of contraband into a State Correctional Institution, to wit communication; Unlawful compensation or reward for official behavior; Unlawful use of two way communication; and Compounding Felony. You are to bring her before me to answer a complaint charging her with one count each of:

F.S.S. 777.04(3) / 944.47 (1)(a)(4) / 847.03 Conspiracy to Introduce Contraband (drugs/tobacco) into a State Correctional Institution to further gang activity

F.S.S. 777.04(3) / 944.47 (1)(a)(6) / 847.03 Conspiracy to Introduce Contraband (cellular telephones) into a State Correctional Institution to further gang activity

F.S.S. 944.47 (1)(a)(1) Introduction of Contraband into a State Correctional Institution (Communication)

F.S.S 838.016 Unlawful Compensation or Reward for Official Behavior

F.S.S. 934.215 Unlawful use of a two-way communication device

F.S.S. 843.14 Compounding Felony

Given under my hand and seal on the ____day of County, Florida.

6/2/2020

, 2020, in Washington

Colphalado.s

CIRCUIT/COUNTY JUDGE

BAIL ENDORSEMENT

The defendant herein described and named shall have bail set in the amount of

TO BE SET AT

FIRST

APPEARANCE



ID#: Adult Def 13 o PC Arrest g Juvenile Def & Application for Warrant/Cepies

AFFIDAVIT - COMPLAINT

rsk's Case No.	20-	185CF
SA Case No.(s)		

1. Agency Name:			2. Agency Report Nurr.	ber 3 Fra	ga Type:			FL037	
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April - June 2017	5. Date/Tin	ne of Arrest:	6. Arresting Office	er.		7. Investigating Senior In	d felony D Officer: spector.	Municipal	County
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ID#: 177713 p PC Arrest p Juvenile Def a Application for Warrant/Capia

AFFIDAVIT - COMPLAINT

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AFFIDAVIT - COMPLAINT (PROBABLE CAUSE NARRATIVE)

20 -185 Case No.
SA Case No.(s)

- A			Agency ORI #FL037275C
80. Agency Name: Florida Department of Corrections	81. Agency Report Numbert 17-13522	82. Date/Time of Arrest:	83. Investigating Officer: Senior Inspector Jerry Basford

84. NARRATIVE OF THE FACTUAL BASIS FOR PROBABLE CAUSE: The undersigned certifies and swears that he/she has just and reasonable grounds to believe that the heretofore named defendant did commit the violations of law as stated above and the factual basis for this belief is as follows:

Your Affiant is Senior Inspector Jerry Basford of the Office of the Inspector General ("OIG"), Florida Department of Corrections ("FDC").

Your Affiant has probable cause to believe between April 2017, and June 2017, former FDC contract staff member Amanda Patterson-Fenn ("Ms. Patterson-Fenn") in the County of Washington and the State of Florida, did commit the following offenses:

On or about October 10, 2016, the defendant, Ms. Patterson-Fenn was hired as a counselor by Unlimited Path, a company providing contract substance abuse counseling services to the FDC at Northwest Florida Reception Center Annex ("NWFRC-A") in Washington County, Florida.

In or about November 2016, Ms. Patterson-Fenn recruited her friend, Kayla Joy Bryars ("Ms. Bryars") as a clinical support employee for Unlimited Path, also working at NWFRC-A.

During the investigation, three cellular telephones were seized. The data from all three devices provided a timeline of events related to the introduction of contraband and the exchange of money for that contraband.

In or about May 2017, a blue Posh brand contraband cellular telephone was recovered from NWFRC-A. The cellular telephone was forwarded to the FDC contract cellular telephone laboratory for extraction. During a review of the device's content, inmate James Dieudonne, DC# 198806 ("Inmate Dieudonne") was identified as a user of the contraband device.

In or about August 2017, a cellular telephone formerly belonging to Ms. Bryars was turned over to the FDC ~ OIG after evidence of contraband introduction and inappropriate relationships with inmates were discovered on the device. The new owner of the device provided consent for the data to be extracted from the device. The extracted data provided messages and images exchanged between Ms. Bryars, Ms. Patterson-Fenn, and Inmate Dieudonne related to inappropriate relationships with inmates, the introduction of contraband into NWFRC-A, and the transfer of payments for criminal activity.

In or about August 2017, a pink Posh brand cellular telephone was recovered from Inmate Dieudonne's person at NWFRC-A. During a raview of the data extracted from the device, correspondence between Inmate Dieudonne and Ms. Patterson-Fenn was identified. The communication from the pink Posh, much like that found on the blue Posh, was related to Ms. Patterson-Fenn's involvement in the introduction and movement of contraband at NWFRC-A.

In January 2017, Ms. Bryars and Ms. Patterson-Fenn escalated their communication discussing inappropriate personal and romantic relationships with several immates they were counseling. Ms. Bryars and Ms. Patterson-Fenn discussed their acquisition and The messages also discussed their participation in the introduction of contraband into NWFRC-A.

On or about April 4, 2017, Ms. Patterson-Fenn states in messages to Ms. Bryars she has orchestrated a plan involving them (Ms. Patterson-Fenn and Ms. Bryars) and two other counselors to introduce contraband into NWFRC-A. The other two counselors would get \$1000.00 each for their participation. Ms. Patterson-Fenn told Ms. Bryars she needs to set up a PayPal account.

On or about April 12, 2017, Ms. Patterson-Fenn and Ms. Bryars discuss a PayPal account. Based on their conversation, both individuals have access to the account. During this same discussion, Ms. Patterson-Fenn tries to justify bringing cigarettes into the prison as being less of a problem than cellular telephones.

On or about April 13, 2017, Ms. Patterson-Fenn and Ms. Bryars discuss someone sending them \$500 via PayPal. The conversation continues into April 14th indicating the money is in Ms. Patterson-Fenn's bank account. The conversation indicated the money is associated with inmates.

On or about April 16, 2017, Ms. Patterson-Fenn tells Ms. Bryars they do not have to wrap anything else, but they do have to drop it off on Mainstreet in Chipley.

On or about April 25, 2017, Ms. Patterson-Fenn tells Ms. Bryars about a mistake she made handling unspecified contraband items. Ms. Bryars explains she is going to tell the inmate(s) she was searched going in and out of the prison and how they cannot risk the x-ray machine.

On or about April 30, 2017, Ms. Patterson-Fenn informs Ms. Bryars an associate of Inmate Dieudonne's sent \$80.00 for Ms.

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On or about April 30, 2017, Ms. Bryars provides inmate Dieudonne's telephone number indicating it belongs to Ms. Patterson-Fenn. The telephone number is the same telephone number Ms. Patterson-Fenn used for her employment with Unlimited Path and is the same telephone number Ms. Patterson-Fenn provided in her visitation information for Inmate Amir Muhammad-Walcott between May 2017, and July 2017. The telephone number was saved to the Posh cellular telephone's contact section as B5. Further, according to Verizon Wireless, the telephone number is associated with a subscriber account belonging to "Amanda Patterson" between October 2012, and February 2019.

Between April 30, 2017, and May 2, 2017, Inmate Dieudonne and Ms. Patterson-Fenn discuss Ms. Patterson-Fenn purchasing multiple cartons of cigarettes, packaging them, and bringing them to Inmate Dieudonne. They also discuss plans Involving Ms. Bryars receiving cellular telephones on behalf of inmates. Inmate Dieudonne also relays information to Ms. Patterson-Fenn Informing her of security staff conducting searches in his dormitory and sending money to Ms. Bryars. Throughout the communication, Ms. Patterson-Fenn makes several references indicating Ms. Patterson-Fenn's use of the gang references indicate the contraband purchases and movement they are discussing are on behalf of the gang.

On or about May 8, 2017, Ms. Patterson-Fenn and Inmate Dieudonne discuss plans for her to introduce contraband digarettes to him on the following day. Ms. Patterson-Fenn describes the contraband digarettes indicating some will have filters and some will not (broken off).

In or about May 2017, Ms. Patterson-Fenn and Ms. Bryars exchange communication discussing the purchase of cigarettes and prescription narcotics and incoming money transfers to Ms. Bryars. The messages also indicate Ms. Bryars communication with Inmate Dieudonne or his associates about receiving and activating cellular telephones. Ms. Bryars and Ms. Patterson-Fenn also discuss receiving payment from inmates for telephones they are receiving.

On or about June 6, 2017, Ms. Patterson-Fenn informs Inmate Dieudonne she has six or seven packs of cigarettes in her car. Ms. Patterson-Fenn indicates she will bring some in the morning and some again at lunch. Ms. Patterson-Fenn also intends to have Ms. Bryars bring some in at lunch.

On or about June 8, 2017, Inmate Dieudonne Instructs Ms. Patterson-Fenn on wrapping contraband items for introduction.

On or about June 11, 2017, Ms. Patterson-Fenn communicates with Inmate Dieudonne about bringing contraband cigarettes into NWFRC-A. In the same conversation, Inmate Dieudonne indicates he has \$120.00 cash he needs to get to his girlfriend. Inmate Dieudonne tells Ms. Patterson-Fenn they have two options for selling ten packs of cigarettes, one way they make \$300 and the other way they make \$300.

On or about June 14, 2017, Ms. Patterson-Fenn tells Inmate Dieudonne she has (40) cigarettes for him. Inmate Dieudonne responds telling Ms. Patterson-Fenn he will need another (40) cigarettes the following day. Inmate Dieudonne also has orders for cellular telephones.

On or about June 20, 2017, Inmate Dieudonne asks Ms. Patterson-Fenn what happened and tells her he is sending Ms. Bryars \$200 for Ms. Patterson-Fenn. Ms. Patterson-Fenn apologizes and indicates the correctional officer assigned to the counseling program was watching her to closely. Ms. Patterson-Fenn indicates she will get more cigarettes and she will bring them in the morning and at lunch the following day.

On or about June 23, 2017, Ms. Patterson-Fenn tells inmate Dieudonne she was unable to get the cigarettes to anyone again due to being watched by security staff. Ms. Patterson-Fenn indicates she brought them in, but had to take all (52) back outside the institution.

During the investigation, subpoenas duces tecum were requested and issued by the Office of the State Attorney, 14th Judicial Circuit. In a response to one of the subpoenas, Western Union indicated on May 4, 2017, Ms. Patterson-Fenn received a money transfer for \$250.00 from Wanda Ively Gonzalez. Through internal FDC records, Wanda Ively Gonzalez was identified as Inmate Alberto Medina's ("Inmate Media"), DC# E47291 mother. Inmate Medina was boused at NWFRC-A at the time of the money transfer, Communication intercepted on May 5, 2017, between Ms. Patterson-Fenn and Ms. Bryars indicated Ms. Patterson-Fenn was handling money from Inmate Medina related to the acquisition of a contraband cellular telephone.

In addition to text messages arranging the purchase and delivery of contraband cigarettes and cellular telephones, Ms. Patterson-Fenn sent (11) digital images to inmate Dieudonne. The images included facial images of Ms. Patterson-Fenn and partially clothed images of Ms. Patterson-Fenn and Ms. Bryars displaying their matching tattoos. One image was Ms. Patterson-Fenn

Throughout the communication with Ms. Patterson-Fenn, she routinely used language indicating

The communication also indicated the contraband she was involved in introducing was on behalf of the gang. Ms. Patterson-Fenn's multiple aliases all reference "5", obtained an openly shared group of images of tattoos with components consistent with



D#ased/on 18 information contained in this investigation and summarized in this affidavit, your Affiant submits probable cause is established that the defendant, AMANDA PATTERSON-FENN, engaged in a criminal conspiracy as defined in Florida Statute 777.04(3), with Kayla Joy Bryars, James Dieudonne, other contract counseling staff at NWFRC-A, other inmates housed at NWFRC-A, and relatives/associates of those inmates, to arrange the purchase/acquisition of contraband items, to prepare those items for introduction into NWFRC-A, and to deliver those items into the secure perimeter of NWFRC-A to provide those items to inmates. Defendant AMANDA PATTERSON-FENN also knowingly received money through at least one money transfer in her own name during May 2017.

Based on the information contained in this investigation and summarized in this affidavit, your Affiant submits probable cause is established that the defendant, AMANDA PATTERSON-FENN engaged in the aforementioned criminal conspiracy with known and while doing so, met the criteria as defined in Florida statute 8/4.03 as being a "criminal gang member" by her use of hand signs associated with the organization, by routinely associating with one or more confirmed members of the organization, by having at least one tattoo used by the organization, and by authoring communication (text messages) indicating responsibility for the commission of any crime (introduction of contraband) by the criminal gang.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, between April 1, 2017, and June 23, 2017, committed violations of Florida Statute, 777.04(3)/944.47(1)(a)(4)/ 874.03, the law relating to street gang activity while conspiring to introduce contraband, the stimulant drug Nicotine, when Ms. Patterson-Fenn did knowingly and intentionally conspire with other individuals to introduce into the secure perimeter of NWFRC-A, tobacco eigarettes containing the stimulant nicotine, and in doing so committed this offense in the furtherance of gang activity.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, between April 1, 2017, and June 23, 2017, committed violations of Florida Statute, 777.04/944.47(1)(a)(6)/874.03, the law relating to street gang activity while conspiring to introduce contraband, cellular telephone(s), when Ms. Patterson-Fenn did knowingly and intentionally conspired with other individuals to introduce into the secure perimeter of NWFRC-A, contraband cellular telephones, and in doing so committed this offense in the furtherance of gang activity.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, between April 1, 2017, and June 23, 2017, committed violations of Florida Statute, 944.47(1)(a)(1), the law relating to introduction of contraband, written or recorded communication when Ms. Patterson-Fenn did knowingly and intentionally transmit electronic text messages and images to contraband cellular telephones to inmates she was aware were housed by the FDC.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, on or about May 4, 2017, committed a violation of Florida Statute, 838.016, the law relating to Unlawful compensation or reward for official behavior, when Ms. Patterson-Fenn did knowingly and intentionally accept and/or agree to accept financial benefits from an immate's relative related to the acquisition and introduction of a contraband cellular telephone.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, between April 1, 2017, and June 23, 2017, committed a violation of Florida Statute, 934.215, the law relating to Unlawful use of a two-way communication device, when Ms. Patterson-Fenn did knowingly and intentionally use a cellular telephone while conspiring to introduce contraband into NWFRC-A and to arrange for money transactions related to the introduction of contraband.

Your Affiant submits probable cause has been established the Defendant, AMANDA PATTERSON-FENN, between April 1, 2017, and June 23, 2017, committed a violation of Florida Statute, 843.14, the law relating to Compounding Felony, when Ms. Patterson-Fenn did have knowledge of the commission of an offense punishable with death or by imprisonment in the state prison, took money or a gratuity or reward or an engagement therefor, or not to give evidence thereof, when such offense of which he had knowledge is punishable with death or imprisonment in the state prison, namely introduction of Contraband, Cellular telephones and tobacco.

telephone(s); 944.47(1)(a)(1), the law relating to introduction of	7.04/944.47(1)(a)(4), the law relating to conspiracy to introduce the law relating to conspiracy to introduce contraband, cellular contraband, written or recorded communication; 838.016, the law relating to Linearity and the law relating to Linearity and the law relating to Linearity and the law relating to the law relating
85. The undersigned, being duly sworn, states that the foregoing information contained in an affidavit consisting of § pages is true and correct to the best of his/her knowledge Signature of Other (Complainant) Plates Complainant Lients (Printed)	Soom to and subface one this 2 day of 100 20 20 20 20 20 20 20 20 20 20 20 20 2

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