

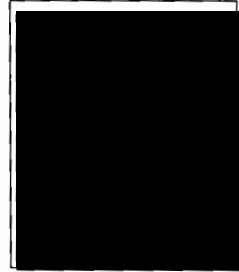
IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT,
IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA
Plaintiff,

Case Number:
Agency Report# OIG19-11972
DIVISION IV

vs.

JASMINE KEYUNSHA WADE
B / F / [REDACTED] / [REDACTED]
Defendant.



CHARGES

INTRODUCING A CONTRABAND WRITTEN RECORD OR COMMUNICATION TO
AN INMATE IN A STATE CORRECTIONAL INSTITUTION
UNLAWFUL USE OF A TWO-WAY COMMUNICATIONS DEVICE
838.016(1) - UNLAWFUL COMPENSATION OR REWARD FOR OFFICIAL
BEHAVIOR
CONSPIRACY
944.39 - INTERFERENCE WITH PRISONERS

ARREST WARRANT

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

To all and singular the Sheriffs and Deputy Sheriffs of the State of Florida:

WHEREAS, complaint under oath was presented before me, the undersigned Judge of this Court this date alleging that JASMINE KEYUNSHA WADE, in Alachua County, Florida, on or about June 22, 2019, did unlawfully introduce into or upon the grounds of a state correctional institution, or did take or attempt to take or send or attempt to send therefrom, a written or recorded communication given or transmitted, to wit: contact information for payment, or intended to be given or transmitted, to an inmate of a state correctional institution, to wit: William Watson, an inmate in Gainesville Work Camp, contrary to Section 944.47(1)(a)(1), Florida Statutes. (L3) [FDLE #3840]

COUNT II: AND WHEREAS the complaint further alleged that JASMINE KEYUNSHA WADE, in Alachua County, Florida, on or about June 22, 2019, did unlawfully and knowingly use a two-way communications device, to-wit: a cell phone, to further the commission of any felony offense, contrary to Section 934.215 Florida Statutes. (L4) [FDLE #5207]

COUNT III: AND WHEREAS the complaint further alleged that JASMINE KEYUNSHA WADE, in Alachua County, Florida, on or about June 2, 2019, a public servant as defined by Section 838.014, Florida Statutes, did request, solicit, accept, or agree to accept a pecuniary benefit not authorized by law in exchange for the performance or nonperformance of an act within the official discretion of JASMINE KEYUNSHA WADE, contrary to 838.016(1), Florida Statutes. (L7) [FDLE #3116].

COUNT IV: AND WHEREAS the complaint further alleged that JASMINE KEYUNSHA WADE, in Alachua County, Florida, on or about June 22, 2019, did then and there agree,

conspire, combine, or confederate with each other to commit the crime of introducing contraband, contrary to Section 777.04 and 944.47(1)(a)(1), Florida Statutes. [FDLE #8415 and FDLE #3840]

COUNT V: AND WHEREAS the complaint further alleged that JASMINE KEYUNSHA WADE, in Alachua County, Florida, on or about June 22, 2019, did, without authority, interfere with or in any way interrupt the work of any prisoner under the custody of the department or did in any way interfere with the discipline or good conduct of any prisoner, contrary to 944.39, Florida Statutes. (M2) [FDLE #3834].

WHEREAS, the Court finds from the facts alleged in said complaint that there is probable cause that said offense was committed and that said Defendant committed them.

NOW THEREFORE this is to Command you to arrest the said **JASMINE KEYUNSHA WADE**, instantler, to be brought before the Court to be dealt with according to law.

Bond is hereby set in the amount of \$ 25,000 STA , \$ 15,000 STA ,
\$ 25,000 STA , \$ 25,000 STA , \$ 15,000 STA .

WITNESS my hand and seal this 3rd day of February, 2020, at GAINESVILLE,
Alachua County, Florida.

W. E. Davis

JUDGE

William E. Davis, Circuit Judge

REVIEWED BY:


DYLAN SMITH
Assistant State Attorney

DEFENDANT INFORMATION

Date: 02/03/2020

JASMINE KEYUNSHA WADE	B	F	27	[REDACTED]	4'11	110	BLACK	BROWN	
Name	Race	Sex	Age	D.O.B	Hgt	Wgt	Hair	Eyes	Complex

Phys. Descript.: Marks – Scars – Defects – Hair Length – Mustache	Mode of Dress
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Vehicle Type - Description - Tag	Address	Home Phone No.
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D.L. State & Number	Social Security No.	Aliases / Maiden Name	Occupation
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Place of Birth	Place of Employment: Name & Address	Business Phone
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Parents Name & Address	Other Identification if Known
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COMPLAINANT INFORMATION

Name	If not Business – Resident Address
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Home Phone No.	Name of Business / Bank	Business / Bank Address	Business / Bank Phone
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Amount of Check	Bank Reason for Returning Check	Remarks
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EXTRADITION AUTHORIZED?

YES Southeast Region; Nationwide; Other _____
 NO

Special Conditions: No Contact with Victim(s); Do Not Possess any Weapons/Firearms; Do Not Possess or Consume any Alcohol or Illegal Drugs; Other _____

FOR USE BY JUDGE:

Investigative Remarks:	State Attorney Bond Recommendation	Bond Ordered By Court
Charges		
1 INTRODUCING A CONTRABAND WRITTEN RECORD OR COMMUN	_\$50,000_	\$25,000 STA
2 UNLAWFUL USE OF A TWO-WAY COMMUNICATIONS DEVICE	_\$15,000_	\$15,000 STA
3 838.016(1) - UNLAWFUL COMPENSATION OR REWARD FOR	_\$25,000_	\$25,000 STA
4 CONSPIRACY	_\$25,000_	\$25,000 STA
5 944.39 - INTERFERENCE WITH PRISONERS	_\$15,000_	\$15,000 STA

DK:

Court No.:

Date of Warrant:

Agency: OFFICE OF THE INSPECTOR GENERAL Date of Offense: 06/22/2019
Agency Report #: OIG19-11972 Affiant Officer: KEITH TURNER

W. E. Davis
William E. Davis
Circuit Judge

February 3, 2020

ARREST SWORN COMPLAINT HOLD

JUVENILE NOTICE TO APPEAR

OFFICE OF THE INSPECTOR GENERAL

PROBABLE CAUSE AFFIDAVIT

OBTS NUMBER:
AGENCY ORI NUMBER:
FL037275C

SPN NUMBER:
AGENCY CASE REPORT NUMBER:
OIG #19-11972

DEFENDANT

NAME OF SUBJECT (LAST, FIRST, MI): **Wade, Jasmine, Keyunsha** ALIAS / MAIDEN:

911 HOME ADDRESS (STREET, APARTMENT NUMBER, ETC.): CITY: STATE: ZIP CODE: TELEPHONE NUMBER:

BUSINESS / SCHOOL ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY: STATE: ZIP CODE: TELEPHONE NUMBER:

MAILING ADDRESS (PO BOX, ETC. IF DIFFERENT THAN 911 ADDRESS): SCARS, MARKS, TATTOOS, FACIAL HAIR, UNIQUE PHYSICAL FEATURES (LOCATION, TYPE, DESCRIPTION):

RACE: WHITE AMERICAN INDIAN BLACK ASIAN / ORIENTAL SEX: **F** DATE OF BIRTH: HEIGHT: **4'11"** WEIGHT: HAIR COLOR: **Black** EYE COLOR: **Brown** COMPLEXION: **Dark** BUILD: **Medium**

DRIVERS LICENSE / STATE ID NUMBER: STATE OF DL / ID: FL SOCIAL SECURITY NUMBER: PHOTO NUMBER: PLACE OF BIRTH: **Florida** COUNTRY OF CITIZENSHIP: **US Citizen**

SUBJECT'S OCCUPATION: **Former Correctional Officer - FDC** SPN NUMBER: AGENCY ORI NUMBER: **FL037275C** SO ID / AGENCY ID / NUMBER: BOOKING NUMBER:

LOCATION OF ARREST: **SWORN COMPLAINT** DATE OF ARREST: TIME OF ARREST (MILITARY): DATE OF BOOKING: TIME OF BOOKING (MILITARY):

SUBJECT IDENTIFIED BY WHOM (VICTIM, WITNESS, LEO, ETC.): **LAW ENFORCEMENT** SUBJECT'S NAME VERIFIED BY (PHOTO ID, FAMILY MEMBER, KNOWN TO OFFICER, ETC.): **DL and FDC RECORDS**

CO-DEF.

(NAME):	DATE OF BIRTH:	RACE:	SEX:	COURT NUMBER:	<input type="checkbox"/> ARRESTED <input type="checkbox"/> SWORN COMPLAINT	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR	JUVENILE: <input type="checkbox"/> YES <input type="checkbox"/> NO
(NAME):	DATE OF BIRTH:	RACE:	SEX:	COURT NUMBER:	<input type="checkbox"/> ARRESTED <input type="checkbox"/> SWORN COMPLAINT	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR	JUVENILE: <input type="checkbox"/> YES <input type="checkbox"/> NO
(NAME):	DATE OF BIRTH:	RACE:	SEX:	COURT NUMBER:	<input type="checkbox"/> ARRESTED <input type="checkbox"/> SWORN COMPLAINT	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR	JUVENILE: <input type="checkbox"/> YES <input type="checkbox"/> NO
(NAME):	DATE OF BIRTH:	RACE:	SEX:	COURT NUMBER:	<input type="checkbox"/> ARRESTED <input type="checkbox"/> SWORN COMPLAINT	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR	JUVENILE: <input type="checkbox"/> YES <input type="checkbox"/> NO

JUVENILE

JUVENILE DISPOSITION: RELEASED TO JAC ISSUED NTA AND RELEASED NAME OF PARENT / GUARDIAN (NOTIFIED YES NO): WORK TELEPHONE NUMBER:

PARENT / GUARDIAN HOME ADDRESS (STREET, APARTMENT #, PO BOX, ETC.): CITY: STATE: ZIP CODE: HOME TELEPHONE NUMBER:

WITNESS

(NAME): Inmate William Watson DC# W02163	ADDRESS: Holmes CI - 3142 Thomas Drive Bonifay, Florida 32425	TELEPHONE NUMBER: 850-547-8600
(NAME):	ADDRESS:	TELEPHONE NUMBER:
(NAME):	ADDRESS:	TELEPHONE NUMBER:
(NAME):	ADDRESS:	TELEPHONE NUMBER:

CHARGE 1

OFFENSE DESCRIPTION: **Introduction of Contraband - Communication** FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: **944.47 (1) (a) (1)** VICTIM NOTIFICATION: ARREST: YES NO

WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: **June 2019** TIME OF OFFENSE: **Various** BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:

VICTIM (NAME): **State of Florida** ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): **700 NE 55th Blvd. State Road 26 East** CITY: **Gainesville** STATE: **Florida** ZIP CODE: **32641**

CHARGE 2

OFFENSE DESCRIPTION: **Unlawful use of a two-way Communications Device** FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: **934.215** VICTIM NOTIFICATION: ARREST: YES NO

WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: **June 2019** TIME OF OFFENSE: **Various** BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:

VICTIM (NAME): **State of Florida** ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): **700 NE 55th Blvd. State Road 26 East** CITY: **Gainesville** STATE: **Florida** ZIP CODE: **32641**

CHARGE 3

OFFENSE DESCRIPTION: **Unlawful Compensation or Reward for Official Behavior** FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: **838.016 (1)** VICTIM NOTIFICATION: ARREST: YES NO

WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: **June 2019** TIME OF OFFENSE: **Various** BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:

VICTIM (NAME): **State of Florida** ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): **700 NE 55th Blvd. State Road 26 East** CITY: **Gainesville** STATE: **Florida** ZIP CODE: **32641**

THE FOLLOWING INCIDENT OCCURRED AT (ADDRESS / LOCATION): **700 NE 55th Blvd. State Road 26 East** CITY OF: **Gainesville** COUNTY OF: **Alachua** STATE OF: **FLORIDA**

Your affiant is Law Enforcement Inspector Keith D. Turner of the Office of the Inspector General, Florida Department of Corrections.

In an incident report submitted on July 12, 2019, Captain Lloyd Dunnam reported while conducting a disciplinary hearing for Inmate William Watson DC# W02163 on July 9, 2019, the inmate provided several pieces of paper containing handwritten notes, to include: the telephone number [REDACTED] the physical address [REDACTED] and the name Torquinsha Williams and \$rainbowskills. Inmate Watson alleged that Gainesville Work Camp Correctional Officer Jasmine Wade had given him the notes to facilitate the introduction of contraband into the secure facility.

On July 9, 2019, Captain Dunnam confiscated the handwritten notes from Inmate Williams and initiated a chain of custody. Subsequently, the evidence was hand delivered to OIG staff and placed into the inspector's evidence locker.

Department records reflect that Correctional Officer Jasmine Wade began her career at Reception Medical Center-West Unit on April 17, 2017 and transferred to Gainesville Work Camp on August 24, 2018. On November 29, 2018, Officer Wade resigned and terminated her employment with the department. On April 22, 2019, Officer Wade was rehired by the Department and returned to Gainesville Work Camp and was assigned as A-Dormitory housing officer for night shift.

Department records reflect that Inmate Watson was housed at Gainesville Work Camp from July 13, 2018 through June 22, 2019. On June 22, 2019, Lieutenant Willie Bryant reported that while Correctional Officer Latara Morris conducted a search of Inmate Watson's personal property and housing area, Officer Morris discovered approximately 37 grams of synthetic cannabinoids concealed in his personal property. Inmate Watson was transported to Lancaster CI and placed in confinement pending administrative charges for possession of contraband.

In an incident report submitted on June 23, 2019, Lancaster CI Correctional Officer James Smith reported while conducting an unclothed search of Inmate Watson, a small cellophane package fell from Inmate Watson's pants as he undressed. Examination of the package revealed a substance believed to be synthetic cannabinoid. Inmate Watson received a disciplinary report possession of aromatic stimulants.

In an incident report submitted on July 2, 2019, Lancaster CI Correctional Officer Adam Pendergraph reported while conducting a security check of L-Dormitory/Quad 1, he observed Inmate Watson in cell L1206 leaning in the corner while rocking back and forth [REDACTED]. Officer Pendergraph also observed that his roommate was [REDACTED] to his (*Pendergraph*) commands. Officer Pendergraph could smell the odor of smoke coming from the cell. Subsequently, both inmates were removed from the cell and escorted [REDACTED].

In the shift supervisor's section of Officer Pendergraph's incident report, Captain Lawrence Storey reported that a search of Inmate Watson's cell was conducted and that a minute amount of a substance believed to be "K-2" was found in the toilet. Both inmates [REDACTED] and were observed for one hour [REDACTED] and returned to their cell without further incident. Both inmates received a disciplinary report for use of unauthorized drugs based on observed behavior.

During a sworn, audio recorded interview conducted on July 26, 2019, Inmate Watson indicated that during an administrative hearing with security staff at Lancaster CI, he provided them with a couple of pieces of paper with Officer Wade's contact information that was handwritten on them. Inmate Watson stated that he received Officer Wade's contact information from her, which included her personal telephone number and physical address. Inmate Watson said that Officer Wade wrote the information on the paper for him. He said that she provided the information to him because they became friendly. Inmate Watson said that Officer Wade approached him

concerning the transactions between the two so she could make some money. Inmate Watson indicated that he had communicated with Officer Wade via a contraband cell phone through several text messages and verbal discussions. He stated that he spoke to Officer Wade via telephone when she was not on duty. Inmate Watson stated that the contraband cell phone had a 352-area code with the last four numbers being 2644; he could not remember the rest of the number.

Inmate Watson indicated that Officer Wade was introducing contraband for payment and that when they spoke; Officer Wade wanted to know how much money she was receiving and when she would receive it. Inmate Watson stated that the "K2" he was caught with was brought in by Officer Wade. He stated that "K2" was the only contraband that she introduced.

Note: Inmate Watson received three disciplinary reports for possession and use of synthetic cannabinoids within an eleven-day period (*June 22nd, June 23rd and July 2, 2019*).

Inmate Watson stated that he had someone (*family/friends*) pay Officer Wade through Western Union and Cash App. He pointed out that the Cash App contact information was on the paper she provided as \$rainbowskills. Inmate Watson stated that he and Wade communicated during the month of June and July of 2019 and that Officer Wade had another telephone number that she would use. Inmate Watson identified the other number as [REDACTED]. He doesn't know how much money during the two-month period he had sent to Officer Wade but believes it was between \$300 and \$400.

Officer Wade introduced the "K2" into the Gainesville Work Camp compound and gave him the contraband approximately a week before he was caught with it on June 22, 2019. He identified the name Torquinsha Williams as Officer Wade's sister which is the name Officer Wade provided to him. Inmate Watson indicated that he didn't have contact with Ms. Williams and that the money went to where Officer Wade facilitated the transfer.

The pieces of paper obtained from Inmate Watson on July 9, 2019 contained handwritten notes, to include: the telephone numbers [REDACTED] [REDACTED] 305-709-0254, the physical address [REDACTED], the name Torquinsha Williams and \$rainbowskills.

A review of department records reflects the following information Officer Wade provided the department upon employment:

- Officer Wade provided telephone number [REDACTED] as her primary contact number.
- Officer Wade provided her physical address as [REDACTED] [REDACTED] *is believed to have been written instead of [REDACTED] on the hand-written address given to the inmate for the purpose of diverting staff from identifying her if the information was discovered*

In an incident report submitted on June 20, 2019, Gainesville Work Camp Correctional Officer Robert Simms reported that while conducting a search in A-Dormitory he discovered a cellular telephone under a pillow. Subsequently, the contraband cell phone was submitted to the FDC Cell Phone Lab for examination.

Inspector Turner reviewed the content of the Phone Lab report regarding the contraband phone with the following obtained:

- A review of the images extracted from the contraband cell phone show several photographs of Inmate Watson.
- A text message sent to Officer Wade's cell phone dated June 14, 2019 at 8:41PM, indicated the following: *"Bae. My girl friend going to call you to meet tomorrow around 5 to meet up in Gainesville to*

give you that what I ask you about. It's his girl ok"

- A text message sent to Officer Wade's cell phone dated June 15, 2019 at 6:59PM, indicated the following: "642604344 confo# western union bae"

On August 20, 2019, Inspector Turner obtained a Search Warrant from the Office of the State Attorney, Eighth Judicial Circuit for the telephone records of Officer Wade's phone ([REDACTED]).

On October 8, 2019, Inspector Turner received the results of Officer Wade's telephone records via email from Sprint Corporate Security with the following information obtained:

- Officer Wade had two-hundred and forty-six contacts with the contraband telephone (352-281-2644) that was discovered inside the secure perimeter of Gainesville Work Camp. The contact occurred between June 14, 2019 and June 20, 2019. **Note:** Per departments records, Officer Wade was on her scheduled days off when the communication occurred.
- Officer Wade contacted the contraband phone via text messages one-hundred and five times.
- Officer Wade was contacted by the contraband phone via text messages one-hundred and seventeen times.
- Officer Wade conducted twenty-four voice contacts with the contraband telephone, with a total duration of twenty minutes and fifteen seconds of communication.

On August 20, 2019, Inspector Turner obtained subpoenas from the Office of the State Attorney, Eighth Judicial Circuit for the Western Union money transfer records in the name of Officer Jasmine Wade and Torquinsha Williams (*Sister of Wade*). On August 26, 2019, Inspector Turner received the subpoena results from Western Union. Upon review by Inspector Turner, the following information was obtained:

- On April 13, 2019, an unidentified person sent \$40 to Jasmine Wade. The \$40 was subsequently picked up on April 14, 2019, by Wade at Publix located at 1302 N Main Street, Gainesville FL.
- On June 2, 2019, Amelia Zepeda of Naples, Florida sent \$80 to Torquinsha Williams. The \$80 was subsequently picked up on June 13, 2019, by Williams at Winn Dixie located at 300 SW 16th Ave, Gainesville FL. **Note:** Amelia Zepeda was identified as Inmate Israel Gutierrez's DC# Y28300 mother. Inmate Gutierrez was housed at Gainesville Work Camp from May 25, 2018 through July 18, 2019. Inmate Gutierrez was released from the department's custody on September 14, 2019.
- On June 7, 2019, Brenda Rook of Bradenton, Florida sent \$75 to Torquinsha Williams. The \$75 was subsequently picked up on June 10, 2019, by Williams at Winn Dixie located at 300 SW 16th Ave, Gainesville FL. **Note:** Brenda Rook (*Brooke*) was identified as Inmate Lee Parker's DC# C11955 mother. Inmate Parker was housed at Gainesville Work Camp from February 7, 2018 through October 8, 2019. Inmate Parker was released from the department's custody on October 10, 2019.

On August 20, 2019, Inspector Turner obtained subpoenas from the Office of the State Attorney, Eighth Judicial Circuit for the Pinger, Inc. (*Bandwidth.com*) account profile associated to the Pinger, Inc (*Bandwidth.com*) account assigned phone numbers [REDACTED] and (305) 709-0254 for April 1, 2019 through July 31, 2019.

On August 27, 2019, Inspector Turner received the subpoena results from Pinger Legal Compliance. Upon review by Inspector Turner, the following information was obtained:

- According to Pinger's customer information sheet, Officer Wade created an account on May 31, 2019 for telephone number 305-709-0254 with account ID number 1109157453 being assigned.
- A review of the detailed message log, Officer Wade contacted the contraband cell phone twelve times in the month of June 2019.
- A review of the detailed message log, Officer Wade received fourteen messages from the contraband cell phone.

On June 6, 2019, a telephone number (352) 339-6944 contacted Officer Wade's Pinger number. The number is associated with Tammie Sargent, the mother of former Inmate Steven Rollins DC# G21819. Inmate Rollins was housed at Gainesville Work Camp from May 23, 2019 through September 2, 2019 and assigned to Officer Wade's housing unit. Inmate Rollins was released from the department's custody on October 8, 2019.

Note: During a review of the FDC Cell Phone Lab's report, a text message dated June 14, 2019 at 3:04PM and from Mrs. Sargent's telephone number stated "*I sent the tracking and confirmation information to the number you give me to use but I wanted to send it to you just in case there's an issue. 575*"

According to Pinger's customer information sheet, Romell Williams created an account on May 30, 2019 for telephone number [REDACTED] with Pinger account ID number 1108910701 being assigned. A review of the detailed message log provided no new information.

In a January 10, 2020, post-Miranda recorded interview, Jasmine Wade made the following statements:

During the initial questioning, Officer Wade denied having an unprofessional or illegal relationship with any inmate while working for the Florida Department of Corrections and while assigned to Gainesville Work Camp (GWC) as a security staff member. Officer Wade further denied communicating with any inmate that was assigned to GWC via text message or verbal communication via telephone, denied receiving money from an inmate or someone associated with an inmate or introducing contraband into the secure perimeter of GWC. When asked if an inmate assigned to GWC would have any reason to have her contact information such as her physical address or telephone number; she replied she wouldn't know because she was local.

Inspector Turner showed Officer Wade a copy of the handwritten information that was in the possession of Inmate Watson and asked her what connection does she have with the notes written on the paper. Wade stated that the name Torquinsha Williams is her sister and that the address is her physical address; however, she lives in [REDACTED] and not Ocala as written on the paper. She also acknowledged that the telephone number [REDACTED] was her contact number. Wade denied knowing anything about the other two telephone numbers that were on the paper. Officer Wade denied having any information concerning the allegation against her.

Inspector Turner confronted Officer Wade with the evidence gathered during this investigation and asked her to explain her involvement with the inmates at GWC.

Officer Wade stated that she communicated with two inmates at GWC via text messages and spoke to them via a contraband cell phone. Officer Wade identified the two inmates as "*Kouvaris*" who was housed in D-Dormitory and Inmate William Watson. She does not remember "*Kouvaris*" last name. (*Kouvaris was identified as Kouvaris Roberts DC# 135517*)

Officer Wade admitted writing her telephone number, the name of her sister (*Torquinsha Williams*) and \$rainbowskills on the paper and providing that information to Inmate Watson.

Officer Wade denied introducing and providing a cell phone to either inmate and stated that Inmate Watson

received his cell phone from Inmate Roberts. She denies knowing how Inmate Roberts obtained the contraband phone.

Inmate Watson gave Wade the number to his contraband cell phone and she spoke to both inmates for about a month and half before Inmate Watson lost the cell phone.

Officer Wade denied introducing drugs or any other contraband into GWC and does not know how Inmate Watson received the contraband. Inspector Turner confronted Officer Wade with a text message from Inmate Watson's cell phone that was sent to her concerning a scheduled meeting with Watson's girlfriend in Gainesville Florida. Officer Wade indicated that she and Inmate Watson had a conversation about her receiving drugs and introducing the contraband into GWC. She said that the text message dated June 14, 2019 was "*supposed to be a drop*". Officer Wade said that she planned on meeting Inmate Watson's girlfriend and receiving some "*pills*" to give to Inmate Watson. She denied going through with it and said that she did not meet the girlfriend as scheduled and reiterated that she did not introduce any drugs into GWC.

When asked why she was receiving money from Inmate Watson's associates via Cash App and Western Union; Officer Wade replied that the inmates were just taking care of her and that she shared the money with her sister Torquinsha Williams.

During the interview, Officer Wade retrieved her cell phone from her pocket and showed Inspector Turner her Cash App information and stated that she received money from the listed individuals on Inmate Watson's behalf. Officer Wade stated that she doesn't know who the people were that sent her money but believes that they were Inmate Watson's family members. Since terminating her employment with the department on July 11, 2019, she has not received any more money. The following information was provided by Officer Wade:

- May 30, 2019 - \$100 from "*Cindy Jo Vaughn*". This individual was not identified.
- June 2, 2019 - \$50 from "*Cynthia Holderfield*". Identified as GWC Inmate Brandon Holderfield DC# V28507 mother.
- June 13, 2019 - \$50 from "*Sonja Coleman*". This individual was not identified.
- June 14, 2019 - \$75.00 from "*Princeton Mommy*". This individual was not identified.

Officer Wade said that she knew that communicating with inmates via cell phone was a violation of law but she got "*complacent*" in her dealings with Inmate Watson and Inmate Roberts.

Your affiant respectfully submits that probable cause has been established that Officer Wade did commit the criminal offense of Introduction of Contraband (*communication*), in violation of s. 944.47 (1) (a) (1) Fla. Stat., when Officer Wade did actually and intentionally introduce, through unauthorized channels, into a secure perimeter of a State Correctional Institution, electronically transmitted written and/or recorded communication to an inmate.

Your affiant respectfully submits that probable cause has been established that Officer Wade did commit the criminal offense of Unlawful Use of a Two-way Communication Device, in violation of s. 934.215 Fla. Stat., when Officer Wade used an electronic communication device to introduce contraband communication to an inmate housed within a State correctional institution.

Your affiant respectfully submits that probable cause has been established that Officer Wade did commit the criminal offense of Unlawful Compensation or Reward for Official Behavior, in violation of s. 838.016 (1) Fla. Stat., when Officer Wade, without authority, knowingly and intentionally requested, solicited, accepted, or agreed

to accept, any pecuniary or benefit not authorized by law, when she accepted and received currency from an inmate with the agreement of introducing contraband (*Controlled Substance*) into a secure perimeter of a State Correctional Institution.

Your affiant respectfully submits that probable cause has been established that Officer Wade did commit the criminal offense of Conspiracy to Introduce Contraband into a State Prison, in violation of s. 777.04 (1) & 944.47 (4) Fla. Stat., when Officer Wade, conspired, combined, or confederated with an inmate by facilitating the introduction of contraband (*Controlled Substance*) into a State Correctional Institution.

Your affiant respectfully submits that probable cause has been established that Officer Wade did commit the criminal offense of Interference with Prisoners, in violation of s. 944.39 Fla. Stat., when Officer Wade engaged in a personal relationship with an inmate under the supervision of the Florida Department of Corrections, and while doing so allowed the inmate to violate laws of the State of Florida and the rules of the Department of Corrections.

Your Affiant requests an arrest warrant be issued for Jasmine Keyunsha Wade, DOB [REDACTED] for two counts in violation of s. 944.47 (1) (a) (1), the laws related to Introduction of Contraband (*communication*); one count in violation of s. 934.215, the laws related to Unlawful Use of a Two-way Communication Device; four counts in violation of s. 838.016, the laws related to Unlawful Compensation or Reward for Official Behavior; one count in violation of s. 777.04 & 944.47 (4), the laws related to Attempts, Solicitation, and Conspiracy to Introduce Contraband into a State Prison; and two counts in the violation of s. 944.39, the laws related to Interference with Prisoners at Gainesville Work Camp, 700 NE 55th Blvd. State Road 26 East, Gainesville, Florida 32641 and in Alachua County.

Supplement Probable Cause Affidavit with additional charges attached.

NTA

<input type="checkbox"/> MANDATORY APPEARANCE IN COURT AT:	DATE OF APPEARANCE:	TIME OF APPEARANCE: <input type="checkbox"/> AM <input type="checkbox"/> PM
I AGREE AND PROMISE TO COMPLY AND ANSWER TO THE CHARGES AND INSTRUCTIONS SPECIFIED IN THIS NOTICE TO APPEAR. WILLFUL REFUSAL TO ACCEPT AND SIGN THIS NOTICE TO APPEAR MAY RESULT IN PHYSICAL ARREST. I UNDERSTAND MY SIGNATURE IS NOT AN ADMISSION OF GUILT OR WAIVER OF MY RIGHTS.	DEFENDANT (SIGNATURE):	DATE:

JURAT

SWORN TO AND SUBSCRIBED BEFORE ME THIS: <u>03</u> DAY OF <u>February</u> , <u>2020</u> SIGNATURE: <u>[Signature]</u> TITLE: <u>LE Inspector</u>	I SWEAR THE ABOVE, AND REVERSE AND ATTACHED PAGES AND STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. NAME (PRINT): <u>INSPECTOR KEITH D. TURNER</u> SIGNATURE: <u>[Signature]</u> AGENCY: <u>DC - OIG</u> LEO ID NUMBER: <u>21744</u>
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ARREST SWORN COMPLAINT HOLD

JUVENILE NOTICE TO APPEAR

OBTs NUMBER:
AGENCY ORI NUMBER:
FL037275C

SUPPLEMENT

PROBABLE CAUSE AFFIDAVIT

SPN NUMBER:
AGENCY CASE REPORT NUMBER:
19-11972

DEF.	NAME OF SUBJECT (LAST, FIRST, MI): Wade, Jasmine, Keyunsha				ALIAS / MAIDEN:			
	RACE: <input type="checkbox"/> WHITE <input checked="" type="checkbox"/> BLACK	<input type="checkbox"/> AMERICAN INDIAN <input type="checkbox"/> ASIAN / ORIENTAL	SEX: F	DATE OF BIRTH: [REDACTED]	HEIGHT: 4'11"	WEIGHT:	JAIL NUMBER:	SO ID / AGENCY ID / NUMBER:

WITNESS	#3 (NAME): Inmate William Watson DC# W02163	ADDRESS: Holmes CI - 3142 Thomas Drive Bonifay, Florida 32425	TELEPHONE NUMBER: 850-547-8600
	#4 (NAME):	ADDRESS:	TELEPHONE NUMBER: ()

CHARGE 5	OFFENSE DESCRIPTION: Conspiracy to Introduce Contraband into Prison	<input checked="" type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER: 777.04 (1) & 944.47 (4)	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION <input type="checkbox"/> CAPIAS NUMBER:	DATE OF OFFENSE: 06/14/2019	TIME OF OFFENSE: 8:41PM	BAIL AMOUNT:	VICTIM'S TELEPHONE NUMBER: ()
	VICTIM (NAME): State of Florida	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): 700 NE 55th Blvd. State Road 26 East	CITY: Gainesville	STATE: FL	ZIP CODE: 32641

CHARGE 6	OFFENSE DESCRIPTION: Interference with Prisoners	<input type="checkbox"/> FELONY <input checked="" type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER: 944.39	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION <input type="checkbox"/> CAPIAS NUMBER:	DATE OF OFFENSE: June 2019	TIME OF OFFENSE: Various	BAIL AMOUNT:	VICTIM'S TELEPHONE NUMBER: ()
	VICTIM (NAME): State of Florida	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): 700 NE 55th Blvd. State Road 26 East	CITY: Gainesville	STATE: FL	ZIP CODE: 32641

CHARGE 7	OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION <input type="checkbox"/> CAPIAS NUMBER:	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:	VICTIM'S TELEPHONE NUMBER: ()
	VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):	CITY:	STATE:	ZIP CODE:

CHARGE 8	OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION <input type="checkbox"/> CAPIAS NUMBER:	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:	VICTIM'S TELEPHONE NUMBER: ()
	VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):	CITY:	STATE:	ZIP CODE:

PROSECUTIVE SUMMARY - CONTINUED