

☒ Adult Def ☒ PC Arrest
☐ Juvenile Def ☐ Application for
Warrant/Capias

AFFIDAVIT – COMPLAINT

Clerk's Case No. _____

SA Case No.(s) _____

PAGE 01 of 4

Agency ORI # **FL037275C**

1. Agency Name: Florida Department of Corrections		2. Agency Report Number: 19-14938		3. Charge Type: <input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Misdemeanor w/associated felony <input type="checkbox"/> Municipal <input type="checkbox"/> County		3a. Ordinance Type: (If applicable) <input type="checkbox"/> Municipal <input type="checkbox"/> County	
4. Date/Time of Offense: 08/15/19 - 08/27/19		5. Date/Time of Arrest: 08/28/2019 / 10:45 a.m.		6. Arresting Officer: Inspector William "Eddie" Dalton		7. Investigating Officer: Inspector William "Eddie" Dalton	

8. Defendant's Name: (Last) Glass		(First) Memorie		(Middle) Jade		ALIAS		9. OBTS:	
10. Race/Sex: W/F		11. Date of Birth: [REDACTED]		12. Residence Type: <input checked="" type="checkbox"/> Florida <input type="checkbox"/> Out of State <input type="checkbox"/> City <input type="checkbox"/> County		13. Weapon Seized <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		14. Controlled Substance Seized: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No TYPE & QUANTITY:	
15. Height: 5'05"		16. Weight: 180lbs		17. Eye Color: Green		18. Hair Color: Black		19. Scars, marks, tattoos, unique physical features: (Location, type & description)	
20. Driver's License Number/State: [REDACTED]		21. Social Security Number: [REDACTED]		22. Residential Telephone: [REDACTED]		23. Business Telephone: N/A			
24. Address: (Street, Apartment Number)		(City)		(State)		(Zip)			

25. Defendant's Name: (Last)		(First)		(Middle)		ALIAS		26. OBTS:	
27. Race/Sex:		28. Date of Birth:		29. Residence Type: <input type="checkbox"/> Florida <input type="checkbox"/> Out of State <input type="checkbox"/> City <input type="checkbox"/> County		30. Weapon Seized <input type="checkbox"/> Yes <input type="checkbox"/> No		31. Controlled Substance Seized: <input type="checkbox"/> Yes <input type="checkbox"/> No TYPE & QUANTITY:	
32. Height:		33. Weight:		34. Eye Color:		35. Hair Color:		36. Scars, marks, tattoos, unique physical features: (Location, type & description)	
37. Driver's License Number/State:		38. Social Security Number:		39. Residential Telephone:		40. Business Telephone:			
41. Address: (Street, Apartment Number)		(City)		(State)		(Zip)			

42. Defendant's Name: (Last)		(First)		(Middle)		ALIAS		43. OBTS:	
44. Race/Sex:		45. Date of Birth:		46. Residence Type: <input type="checkbox"/> Florida <input type="checkbox"/> Out of State <input type="checkbox"/> City <input type="checkbox"/> County		47. Weapon Seized <input type="checkbox"/> Yes <input type="checkbox"/> No		48. Controlled Substance Seized: <input type="checkbox"/> Yes <input type="checkbox"/> No TYPE & QUANTITY:	
49. Height:		50. Weight:		51. Eye Color:		52. Hair Color:		53. Scars, marks, tattoos, unique physical features: (Location, type & description)	
54. Driver's License Number/State:		55. Social Security Number:		56. Residential Telephone:		57. Business Telephone:			
58. Address: (Street, Apartment Number)		(City)		(State)		(Zip)			

59. Charge Description: (# 1) Introduction of Contraband into a State Correctional Facility to wit: (written communication) (30 counts)		60. Statute or Ordinance Number: 944.47(1)(a)(1)		<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.	
61. Charge Description: (# 1) Unlawful Use of a Two-way Communication Device (25 counts)		62. Statute or Ordinance Number: 934.215		<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.	
63. Charge Description: (# 1)		64. Statute or Ordinance Number:		<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.	

65. Victim's Name: (If business, list legal business name) (Last) State of Florida		(First)		(Middle)		66. Race/Sex		67. Date of Birth:		68. Telephone Number:	
69. Contact Person if victim is deceased, a minor child, or business: (Last) Inspector William "Eddie" Dalton		(First)		(Middle)		70. Race/Sex		71. Date of Birth:		72. Telephone Number: 850-569-5260	
73. Address: (Street, Apartment Number) 5563 10th Street		(City) Malone		(State) Florida		(Zip) 32445		74. Secondary Phone Number:			
75. Victim Notification of Arrest: NOTIFIED BY: _____ DATE: _____ TIME: _____						76. Information Given: <input type="checkbox"/> Victim <input type="checkbox"/> Rights Card <input type="checkbox"/> App. Info <input type="checkbox"/> Arrest Info <input type="checkbox"/> Domestic <input type="checkbox"/> Viol. Info					

77. Physical Evidence collected in this case? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		78. Witness Statements taken in this case? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		79. I certify that all of the above information is true and correct to the best of my knowledge and is page 01 of a 3 page affidavit/complaint.	
Evidence Custodian's Name: Darla Henderson		Person responsible for statements: William Dalton		Officer/Complainant Signature William Dalton Type or print Complainant name	

☒ Adult Def ☐ PC Arrest
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AFFIDAVIT – COMPLAINT (PROBABLE CAUSE NARRATIVE)

Clerk's Case No. _____

SA Case No.(s) _____

Agency ORI # **FL037275C**

80. Agency Name: Florida Department of Corrections	81. Agency Report Number: 19-14938	82. Date/Time of Arrest:	83. Investigating Officer: Inspector William "Eddie" Dalton
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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 Law Enforcement Inspector William "Eddie" Dalton with the Florida Department of Corrections, Office of the Inspector General. Your Affiant has probable cause to believe that between August 15, 2019 through August 27, 2019, at Jackson Correctional Institution, 5563 10th St Malone, Florida 32445, Correctional Officer Trainee (COT), Memorie Glass, a COT with the Florida Department of Corrections, did commit the criminal offense of Introduction of Contraband into a State Correctional Institution, in violation of s. 944.47(1)(a)(1) Fla. Stat., when COT Glass did actually and intentionally transmit digitally written and recorded communications into the secure perimeter of a State Correctional Institution to Inmate Ramon Luna DC#T64489; and COT Glass did commit the criminal offense of Unlawful Use of a Two-Way Communications Device in violation of s. 934.215 Fla. Stat., when COT Glass did actually and intentionally utilize her personal cellular telephone to transmit digitally written and recorded communications to Inmate Luna while Inmate Luna was housed within the secure perimeter Jackson Correctional Institution.

On August 20, 2019, The Florida Department of Corrections, Office of the Inspector General received information from Jackson Correctional Institution, Colonel Jerry Shuler which indicated the possibility of a staff member communicating with Inmate Luna via J-Pay, an email application used by inmates to communicate with outside civilians and family members.

On August 20, 2019, COT Priscilla Porter wrote an incident report that stated; She and COT Glass were engaged in a conversation at work, when COT Glass advised she had been talking with Inmate Luna. According to COT Porter, COT Glass advised Inmate Luna had asked COT Glass to create a fake J-Pay account so the two could communicate. COT Porter advised COT Glass further stated Inmate Luna wanted COT Glass to call his mother. COT Porter advised she was not sure if COT Glass created the J-Pay account but COT Glass did not see the harm in communicating with Inmate Luna.

On August 22, 2019, COT Porter provided a sworn statement to the facts listed in her incident report. COT Porter provided a telephone number of [REDACTED] for COT Glass. COT Glass indicated she has spoken to COT Glass on this number several times.

Upon further review, Your Affiant was able to determine that a fictitious J-Pay account was created on August 15, 2019, in order to communicate with Inmate Luna. The J-Pay account had the listed name of Sarah Scott, an address of 3900 Arbor Trace Dr, Lynn Haven, Florida, 32444, telephone number of 850-325-6717, and an email address of sscott0013@gmail.com.

The content of the J-Pay messages was romantic in nature and the author of the emails, Sarah Scott (COT Glass) and Inmate Luna professed their love for one another. There were also 3 sexuality explicated pictures that the author, Sarah Scott (COT Glass) sent that showed a buttock of a white female with Thong type panties on. The author Sarah Scott (COT Glass) also indicated they were communicating via a telephone. From August 15, 2019 through August 27, 2019, Sarah Scott (COT Glass) sent thirty (30) J-pay emails to Inmate Luna and received thirty-three (33) J-Pay emails.

Your affiant was able to listen to the Securus telephone system and located several telephone calls from Inmate Luna to approved number 863-943-5029, which is Inmate Luns's mother, Maribel Pineda. During a telephone conversation between Inmate Luna and his mother, Ms. Pineda on August 23, 2019, at approximately 19:03:44, Inmate Luna and his mother are talking in code in reference to a telephone number. During the conversation, Inmate Luna advised his mother, Ms. Pineda that the area code is his grandmother's birthday. Inmate Luna then stated [REDACTED] Inmate Luna then advised the prefix is his grandfather's birthday. Inmate Luna then stated the number [REDACTED] Inmate Luna and his mother converse about a family tree and Inmate Luna stated the last four is [REDACTED]

Investigator Note: The number that was provided for COT Glass by COT Porter was [REDACTED]

On August 23, 2019, at approximately 19:18:50 Inmate Luna called his mother, Ms. Pineda using the Securus telephone system. During the conversation Ms. Pineda gave the phone to Inmate Luna's son, Damion. Inmate Luna asked his son to reach out to his girl for him. Inmate Luna provided his son the telephone number [REDACTED] (COT Glass number). Inmate Luna's son attempted to call the number but there was no answer.





On August 25, 2019, at approximately 20:27:51 Inmate Luna called his mother, Ms. Pineda using the Securus telephone system. During the conversation, Ms. Pineda gave the phone to Inmate Luna's son, Damion. While speaking with Inmate Luna, his son called [REDACTED] and made contact with a female. During the conversation Inmate Luna and the female talk on speaker phone. The two are professing their love for each other and talking about what sexual position they would like to be in. The female stated "I love you daddy".

On August 27, 2019, Inspector Dalton made contact with Warden Brannon in reference to the possibility of a possible staff offender relationship between COT Glass and Inmate Luna. Warden Brannon advised he had not authorized COT Glass to communicate with Inmate Luna using J-Pay or any other means other than the normal compacity of her job. Warden Brannon advised that COT Glass had a J-pay account in her name when she interviewed for the Correctional Officer position. Warden Brannon advised COT Glass that she would not be allowed to communicate with inmates using J-Pay or any other unauthorized means if she was hired. Warden Brannon indicated COT Glass acknowledged this and advised she would delete the account and cut ties with her ex-boyfriends that are incarcerated.

On August 28, 2019, at approximately 9:40 a.m., COT Glass provided a post Miranda sworn statement to Inspector William Dalton. COT Glass indicated she was hired on July 19, 2019, as a Correctional Officer Trainee. COT Glass advised she has two telephones. One number is [REDACTED] and the other number is [REDACTED]. COT Glass advised she did attend the one hundred twenty-hour orientation upon becoming employed at Jackson Correctional Institution. COT Glass indicated she received training on staff offender relationship's and they are strictly prohibited. COT Glass remembered having a conversation with Warden Brannon in reference to J-Pay and visitation. COT Glass indicated Warden Brannon advised her she was not authorized to communicate with inmates using J-pay.

Your affiant has probable cause to believe that COT Glass used her cellular phone on at least twenty-five occasions to transmit digitally written communications to Inmate Luna via J-Pay and digitally transmitted written communications to Inmate Luna thirty times via J-Pay.

Your Affiant respectfully submits probable cause has been established to conclude Correctional Officer Trainee, Memorie Glass did commit the criminal violation of Introduction of Contraband into a State Correctional Institution (30 Counts), in violation of s. 944.47(1)(a)(1) Florida Statute, when COT Glass did actually and intentionally transmit digitally written communications into the secure perimeter of a State Correctional Institution to Inmate Luna on thirty (30) occasions. Your Affiant further submits probably cause has been established COT Glass did commit the criminal violation of Unlawful Use of a Two-Way Communications Device (25 counts), in violation of s. 934.215 Florida Statute when COT Glass did actually and intentionally utilize a cellular telephone to transmit digitally written communications to Inmate Luna while Inmate Luna was housed within the secure perimeter of a Jackson Correctional Institution.

85. The undersigned, being duly sworn, states that the foregoing information contained in an affidavit consisting of <u>3</u> pages is true and correct to the best of his/her knowledge		Sworn to and subscribed before me this <u>28</u> day of <u>August</u> , 20 <u>19</u>	
			
Signature of Officer/Complainant		Signature of Person Administering Oath	
<input checked="" type="checkbox"/> Personally Known <input type="checkbox"/> Other Identification			
		Seal	
Officer/Complainant's Name (Printed)		ID Type	
			
Inspector			
ID Number			

87. Adult's Relation to Juvenile Defendant: <input type="checkbox"/> Parent <input type="checkbox"/> Legal Guardian <input type="checkbox"/> Other _____		88. Adult's Name: (Last)		(First)	(Middle)
89. Address: (Street, Apartment Number)		(City)	(State)	(Zip)	90. Residential Phone:
92. Notified By: (Name)		93. Date/Time:		91. Business Phone	
95. Law Enforcement Disposition of Juvenile Contact: (Check one and complete release data)		Transferred to <input type="checkbox"/> Secure Detention		Released to <input type="checkbox"/> HRS Intake Officer, not detained	
Release Date: _____ Release Time: _____ Released to (Name): _____		Processed within the agency and released <input type="checkbox"/> to other than HRS		<input type="checkbox"/> Person <input type="checkbox"/> Telephone	