☑ PC Arrest Adult Def ☐ Juvenile Def ☐ Application for

AFFIDAVIT – COMPLAINT

Clerk's Case No.	
SA Case No.(s)	

Warrant/Capias PAGE 01 of 2 Agency ORI # FL037275C												
Florida Department of Corrections 19-20788				3. Charge ☑ Felony	e Type: y							
4. Date/Time of Offense: 5. Date/Time of Arrest: 11/26/19 8:30 A.N			A.M. 6. /	M. 6. Arresting Officer: Inspector William Dalton			7. Investigating Officer: Inspector William "Eddie" Dalton					
8. Defendant's Na	me: (Last)			_:	irst) ony			liddle) 'shay		ALIAS	9. OBTS:	
10. Race/Sex: B/F	11. Date of Birth:		12. Reside	ence Type:	☑ Florida ☐ Out of State		13. Wear	oon Seized		lled Substance Seized: & QUANTITY: n	Yes No	
15. Height: 5-02	16. Weight: N/A	17. Eye Co Brov		Hair Color: Black	19. Scars, marks	s, tattoos, un	ique physica	il features: (Lo	ocation, type &	description)		
20. <u>Driver's Licens</u>			21. Social	Security Numb		22. Reside	ential Teleph			23. Business Telep		
24. Address: (Stre	et, Apartment Numb	er)			(Citv)			(Stat	e)		(Zip)	
25. Defendant's N	ame: (Last)			(F	irst)		(N	liddle)		ALIAS	26. OBTS:	
27. Race/Sex:	28. Date of Birth:		29. Reside		☐ Florida			on Seized		led Substance Seized: QUANTITY:	Yes No	
32. Height:	33. Weight:	34. Eye Co	olor: 35.	Count Hair Color:	y ☐ Out of Stat 36. Scars, marks		Yes ique physica	□ No Il features: (Lo	ocation, type &	description)		
37. Driver's Licens	e Number/State:		38. Social	Security Numb	l per:	39. Reside	ential Teleph	none:		40. Business Telep	hone:	
41. Address: (Stre	et, Apartment Numb	er)			(City)			(Stat	e)		(Zip)	
42. Defendant's N	ame: (Last)			(F	irst)		(M	liddle)		ALIAS	43. OBTS:	
				•			·					
44. Race/Sex:	45. Date of Birth:		46. Reside		☐ Florida ☐ Out of State	•	47. Weap ☐ Yes	on Seized		led Substance Seized: QUANTITY:	☐ Yes ☐ No	
49. Height:	50. Weight:	51. Eye Co	ofor: 52.	Hair Color:	53. Scars, marks	s, tattoos, uni	que physica	l features: (Lo	ocation, type &	description)		
54. Driver's Licens	e Number/State:		55. Social	Security Numb	er:	56. Reside	ential Teleph	one:		57. Business Telep	hone:	
58. Address: (Street	et, Apartment Numb	er)			(City)			(State	e)		(Zip)	
59. Charge Descri	otion: (# 1)							60 Statuto	or Ordinance N	lumbor		
Introduct	ion/Removal	of Cont	raband, (Commun	ication (3 co	ounts)		944.4	47 (1)(a)(1)		☑ F.S. ☐ Ord.
61. Charge Description: (#1) Introduction/Possession of Contraband, Communication (2 counts))	944.47 (1)(a)(1)			☑ F.S. ☐ Ord.					
63. Charge Description: (#1) 64. Statute or Ordinance Number: Gr.S.												
65. Victim's Name: State of F	(If business, list leg	al business n	name) (Last)	(Fi	rst)		(Middle)	60	6. Race/Sex	67. Date of Birth:	68. Telephone Numbe	er:
	n if victim is decease William "Ed			ss: (Last)	(First)		(Middle)	70	0. Race/Sex	71. Date of Birth:	72. Telephone Numbe 850-569-180	
73. Address: (Stree 5563 10 th	et, Apartment Numbe Street		(City) Malone		(State) Florida		(Zij	2445			74. Secondary Phone	Number:
75. Victim Notificat		545		T.0					76. Inform Victim		Arrest Info Domestic Info	
NOTIFIED BY:		DA	ie:	TIM	E:							
77. Physical Evider Yes	nce collected in this No		Yes	Statements tak	en in this case?		1		affidavincompl	ue and correct to the b	est of my knowledge	
Evidence Person Custodian's responsible Name: Inspector Daria Henderson Name: Inspector Daria Henderson Name: Inspector Daria Henderson Name: Inspector William Dalton Type or print Complainant name												

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

AFFIDAVIT - COMPLAINT (PROBABLE CAUSE NARRATIVE)

rk's Case No		
A Case No.(s)		

Agency ORI # FL037275C

80. Agency Name:	81. Agency Report Number:	82. Date/Time of Arrest:	83. Investigating Officer:
Florida Department of Corrections	19-20788	11/22/19 - 8:30 A.M.	Inspector William "Eddie" Dalton

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 of 2019 through November 22, 2019, while employed at Jackson Correctional Institution, 5563 10th St Malone, Florida 32445, Ebony Cotton (Officer Cotton), a Correctional Officer with the Florida Department of Corrections, did commit five (2) counts of the criminal offense of Introduction / Possession of Contraband into a State Correctional Institution, in violation of F.S.S. 944.47(1)(a)(1), when Officer Cotton did actually and intentionally created two (2) unauthorized written communication (letters) by handwriting letters and giving the unauthorized written communication to Inmate Bernard Jones DC#M82794, who is an Inmate housed within the secure perimeter of a State Correctional Institution (Jackson Correctional Institution); and Officer Cotton did commit three (3) counts of F.S.S. 944.47 (1)(a)(1) by Removal / Introduction of contraband (written communication), when Officer Cotton did actually and intentionally removed three (3) unauthorized written communication letters that were written to her from Inmate Jones who is an Inmate housed within the secure perimeter of a State Correctional Institution (Jackson Correctional Institution).

On November 22, 2019, The Florida Department of Corrections, Office of the Inspector General received information from Jackson Correctional Institution, Colonel Jerry Shuler which indicated Officer Cotton was communicating with Inmate Jones via unauthorized written letters.

On November 22, 2019, Sergeant Timothy Benton (Assistant STG Coordinator) wrote an incident report that stated; Sergeant Benton reported for duty at Jackson Correctional Institution at approximately 4:15 a.m. to assist with the morning meal. Sergeant Benton was given a "KITE" (Hand written Note) that was found in the control room. Sergeant Benton was able to identify the writer of the 'KITE" as Inmate Jones who is assigned to B-Dormitory, wing 1, cell 123U. Inmate Jones was describing "who am I" in the body of the "KITE". Inmate Jones outlined he was a "ex-drug dealer / ex-killer / Dedicated lover / Ebony Lover." Sergeant Benton indicated Officer Ebony Cotton works B-dormitory which is the dormitory Inmate Jones is assigned to.

Sergeant Benton and Sergeant Trenton Carter searched Inmate Jones property and located six (6) hand written letters addressed to "Chocolate Drop" from a "Black Diamond." The Arthur of the letters indicated in the letters they were trying to just pass their 12 hours on by. The Arthur wrote this shift make them a bitter person. The letters were provided to Inspector Dalton for inspection.

In one letter recovered from Inmate Jones property, the Arthur wrote "I truly want to know exactly who I'm dealing with. Who are you? Where are you from? Who are your people? What are your moods? Everything about you. And then how do I know that this is true?"

Investigator notes: This letter asked specific questions that were answered in the "KITE" that was located in the control room.

One letter is written on the back of an Inmate call out list. In this letter the writer is talking about personal situations with a sister. The writer is asking why do you love me? What are your intentions? Am I just another one of your victims?

In one letter recovered from Inmate Jones property, the Arthur addressed the letter, "Hey Chocolate Drop." The Arthur wrote, "I really like you. Maybe it was your smile, maybe it was your personality, or maybe it was just you. Anyway, just know whatever it actually was "hooked me." The writer wrote, their relationship could be something great but everything needs to be upfront and truthful. The writer asked the reader why he was interested in her and what actually made you want to make your move and talk to me. And why? Like how serious are you? What do you expect? I really want to know all of this so that I'll know what I'm getting myself into." The writer signed the letter "love, Black Diamond."

In one letter recovered from Inmate Jones property, the Arthur wrote, "I love my job to death, not for the money, but the job itself, but would be a bit of danger to it?" The writer wrote "I can't say because I'm torn and don't really know what decision would I make." The writer wrote, "I want to give it my all, but how can I?" The writer wrote, "I'm not actually stalking you, I just want to understand who and what I'm dealing with." The writer ended by writing "Look at me making rant about this. What have you done?? Love, Black Diamond."

The Arthur's handwriting was compared to Officer Cotton's handwriting from Jackson Correctional Institution B-Dormitory housing unit logs on November 18, 2019, November 19, 2019, and November 20, 2019. The handwriting was consistent and had several handwriting exemplars throughout the letters.

On November 22, 2019, Inspector Dalton made contact with Warden Brannon in reference to a possible staff offender relationship between Officer Cotton and Inmate Jones. Warden Brannon advised he had not authorized Officer Cotton to communicate with Inmate Jones using written communication or any other means other than the normal compacity of her job.

On November 22, 2019, at approximately 12:53 p.m., Inmate Jones provided a sworn statement to Inspector William Dalton. Inmate Jones indicated he has been at Jackson Correctional Institution since August of 2018. Inmate Jones advised he has been housed in B-dormitory since March of 2019. Inmate Jones indicated he began talking to Officer Cotton in August 2019. Inmate Jones

advised he wrote Officer Cotton several letters and gave them to her while she was working in B-Dormitory. Inmate Jones indicated Officer Cotton started writing him back and the two exchanged several handwritten letters. Inmate Jones advised the letter that was located at Jackson Correctional Institution was written by him and given to Officer Cotton. Inmate Jones advised the letters that was located in his property was written by Officer Cotton and given to him through the flap in the officer station. Inmate Jones indicated he and Officer Cotton are in the early stages of a boyfriend / girlfriend relationship and he is in love with Officer Cotton. Inmate Jones advised he has not received a Disciplinary report (DR) in over three (3) years.

On November 26, 2019, at approximately 6:50 a.m., Correctional Officer Ebony Cotton provided a post Miranda sworn statement to Inspector William Dalton. Officer Cotton indicated she was hired on January 25, 2019, as a Correctional Officer Trainee. Officer Cotton advised she did attend the one hundred twenty-hour orientation upon becoming employed at Jackson Correctional Institution. Officer Cotton indicated she received training on staff offender relationship's and they are strictly prohibited.

Officer Cotton indicated	Officer Cotton advised					
	Officer Cotton advised					
	Officer Cotton advised					
	Officer Cotton advised					
Officer Cotton admitted						
	Officer Cotton advised					
	Officer Cotton advised					
Officer Cotton further stated						

Your Affiant respectfully submits probable cause has been established to conclude Correctional Officer Ebony Cotton did commit the criminal violation of Introduction / Possession of Contraband into a State Correctional Institution (2 Counts), in violation of s. 944.47(1)(a)(1) Florida Statute, when Officer Cotton did actually and intentionally created two (2) unauthorized written communication (letters) by handwriting letters and giving the unauthorized written communication to Inmate Bernard Jones DC#M82794, who is an Inmate housed within the secure perimeter of a State Correctional Institution (Jackson Correctional Institution); and Officer Cotton did commit three (3) counts of F.S.S. 944.47 (1)(a)(1) by Removal / Introduction of contraband (written communication), when Officer Cotton did actually and intentionally removed three (3) unauthorized written communication letters that were written to her from Inmate Jones who is an Inmate housed within the secure perimeter of a State Correctional Institution (Jackson Correctional Institution).

85. The undersigned, being duly sworn, states that the fo affidavit consisting of 2 pages is true and correct to Signature of Officer/Complainant		Sworn to		on Administering Oath Other Identification	f
Officer/Complainant's Name (Printed) 87. Adult's Relation to Juvenile Defendant:	OFS ID Number	Seal	e: (Last)	(First)	(Middle)
89. Address: (Street, Apartment Number)	(City)	(State)	(Zip)	90. Residential Phone:	91. Business Phone
92. Notified By: (Name)				93. Date/Time:	94. Notification Method: □ Person □ Telephone
95. Law Enforcement Disposition of Juvenile Contact: (Check one and complete release data)	Transferred to ☐ Secure Detention	Released to HRS Intake Offi	cer, not detained	Processed within the ag	ency and released
Release Date: Release Time:	Released to (Name):				