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IN THE COUNTY/CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL
CIRCUIT

IN AND FOR BREVARD COUNTY, FLORIDA

05-2012-CF35337-A XXX-XX

05-2012-CF 35338-A XXX-XX

FILED IN VERA-13
CLERK OF CIR. CT.
BREVARD CO. FL.
2012 MAR 19 P 3:02

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AFFIDAVIT FOR SEARCH WARRANT
VEHICLE

BEFORE ME, Charles G. Crawford
Judge of the County/Circuit Court, in and for BREVARD County, Florida, personally
appeared, Don N. Reynolds, an Agent of the Brevard County Sheriff's Office Special
Victims Unit, identification number 265, who being first duly sworn, deposes and says
that he has reason to believe that evidence to be used in the violation of certain laws is
being kept in certain vehicle, in Brevard County, Florida, being known and described as
follows:

1996 WHITE FORD FOUR DOOR SUV
VEHICLE IDENTIFICATION # 1FMDU32X4TUA77965

The above-described vehicle was impounded and is currently in the custody of The
Brevard County Sheriff's Office and is being kept in a secure facility located at 860
Camp Rd. Cocoa, Brevard County, Florida.

To reach the location of the vehicle one would begin at the intersection of U.S. 1 and
Camp Rd. Cocoa, Brevard County, Florida. From this intersection one would travel west
on Camp Road for approximately (1.25) miles until reaching the entranceway to 860
Camp Rd. (Brevard County Jail and Fleet Maintenance). One would turn right (north)
onto the access road to the Brevard County Jail and impound lot. The secured impound
lot is located on the right (northeast) side of the Brevard County Jail complex.

The vehicle in question was occupied by suspects Brandon Lee Bradley (black male
D.O.B 8-23-1989) and Andria Michelle Kerchner (white female D.O.B 5-31-1992)
following a Robbery with a Deadly Weapon and the Murder of a Law Enforcement
Officer. Brandon Lee Bradley claimed ownership of the vehicle, which he was driving at
the time of his apprehension.

EVIDENCE SOUGHT

Firearms and associated magazines/clips, firearm cartridges, bullets and casings,
projectiles or any other items associated with a firearm, cell phones, latent prints, trace
evidence, blood, hair, and fibers or any other biological evidence, property taken from the
Econo Lodge to included bed linens, pillows, and the front of an air conditioning unit.

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D. FARRIS

The facts establishing the grounds for this affidavit and the probable cause for believing that such facts exist are as follows:

On Tuesday, March 06, 2012, at approximately 1053 hours, Brevard County Sheriff's Office Deputies responded to Econo Lodge, 4455 West New Haven Ave., Melbourne, Brevard County, Florida regarding a theft of property. The victim, Mohammad H. Malik, advised a white female (later identified by witnesses through photographic lineups as Andria Michelle Kerchner) and a black male (later identified through photographic lineups as Brandon Lee Bradley) had taken property from room 166, which belonged to the Econo Lodge. The victim further indicated the two fled the area in a white Ford SUV bearing Florida tag 002LVI. The vehicle was subsequently located in the area of John Rodes and Lamp Lighter by Deputy Barbara Pill.

At approximately 1100 hours Deputy Barbara Pill, while working for the Brevard County Sheriff's Office in a road patrol capacity, initiated a traffic stop on a suspect white SUV vehicle driven by Brandon Lee Bradley with passenger Andria Michelle Kerchner in the area of John Rodes Blvd. and Elena Way, Melbourne. Deputy Pill ordered the driver out of the vehicle. Bradley refused to exit the vehicle. At one point the vehicle proceeded to slowly drive away. Deputy Pill then approached the vehicle on foot. Deputy Pill continued to order Bradley out of the vehicle. At this point, Deputy Pill was standing in the area of the open driver's door of the vehicle. While verbally attempting to have Bradley exit the vehicle, Bradley shot Deputy Pill numerous times at point blank range, killing Deputy Pill. At this point the driver's door closed. Bradley and Kerchner drove away leaving Deputy Pill fatally wounded on the roadside. Deputy Pill's in car video camera captured the above listed events.

Bradley and Kerchner were subsequently apprehended a short time later in the area of Parkway and Turtlemound, Melbourne, Brevard County, Florida in the same white Ford SUV bearing the attached tag 002LVI and vehicle identification number 1FMDU32X4TUA77965. Upon the arrest of Bradley and Kerchner witness observed a cell phone located inside the vehicle. Information disclosed by witnesses indicated Kerchner and Bradley made multiple phone calls following the shooting, where they admitted involvement in the death of Deputy Pill.

On this same date, Agent Gregory Richter met with victim and witnesses at 4455 West New Haven and verified Kerchner and Bradley were involved in a robbery. Witnesses Vanessa A. McNerney and Tammy Brown reported seeing the white female and black male removing property from room 166 and placing items into the white Ford SUV. Victim, Andrew Jordan, stated he was alerted to the theft by McNerney and Brown and went to confront the two subjects. The three reportedly confronted the two in the area of room 166, whereas, the black male entered into the driver's side of white Ford SUV and the white female entered into the passenger side. Victim Jordan stated he told the black male to return the property, which included bed line4s, pillows and an air condition front. The male provided a blank stare and subsequently started the vehicle. Victim Jordan attempted to prevent the vehicle from leaving at which time the black male drove off striking Jordan with the vehicle as he fled the scene.

Victim, Andrew J. Jordan, positively identified Brandon Lee Bradley in a six person photo lineup as the person driving the vehicle. Witness Vanessa A. McNerney and Victim Mohammad H. Malik, after viewing photo lineups, each identified both suspects as the two involved in the robbery.

During a sworn taped post Miranda interview, Brandon Lee Bradley admitted shooting Deputy Pill with a firearm.

Based on the above sworn statements given by the witnesses in this investigation, there is probable cause to believe there is evidence contained within the 1996 White Ford SUV bearing vehicle identification number 1FMDU32X4TUA77965, which was occupied by Brandon Lee Bradley and Andria Michelle Kerchner during and following the commission of a robbery with a deadly weapon and the murder of a law enforcement officer. Said evidence tends to prove that the defendants committed First Degree Premeditated Murder, contrary to section 782.04(1)(a)1, Florida Statutes, First Degree Felony Murder, contrary to Section 782.04(1)(a)2.d., Florida Statutes, and Robbery with a Deadly Weapon, Contrary to Section 812.13(2)(a) Florida Statutes.

The information contained within this Affidavit is based on Your Affiant's personal observations and training and on sworn statements of material witnesses.

Your Affiant, Agent Don N. Reynolds, has been employed as a Brevard County Sheriff's Deputy for Sixteen years. Prior to this Your Affiant was a Brevard County Reserve Deputy for two years. Your Affiant is a certified law enforcement officer in the state of Florida, his certification having been obtained after attending 585 hours of training in a law enforcement academy at the Criminal Justice Center, of Seminole Community College, Lake Mary Campus. Your Affiant has been an investigator for thirteen years to include assignments within the General Crimes Unit, the Investigative Support Unit, Special Victim's Unit and currently assigned to the Homicide Unit. Your Affiant has investigated over 600 felony crimes and assisted in numerous other felony and federal investigations. Your Affiant has attended numerous classes at the local and state level in the investigation of felony crimes against persons to include: Investigative interviews and Interrogations, injury and death investigations, Internet Crimes Investigations, Basic Criminal Investigations, Armed Robbery and fire Scene Investigations, Forfeitures/Seizure Seminar, Kinesic Interviews and Interrogation, Pattern Criminal Investigations and various other investigative courses. Your Affiant has a graduate degree in criminal justice from the University of Central Florida and a Bachelor of Science degree in Criminal Justice with a minor in Business Management from Northern Michigan University.

WHEREFORE, Your Affiant makes this affidavit and prays for the issuance of a Search Warrant in due form of law commanding the Sheriff of Brevard County and necessary assistance, to search the above described vehicle for the said property heretofore described, and to seize and safely keep same, either in the daytime or in the nighttime, or on Sunday, as the exigencies of the occasion may demand, in order that the evidence may be procured to be used in the prosecution of such person or persons who have unlawfully

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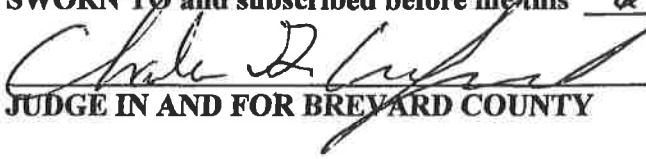
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used, possessed, or are using or possessing the same in violation of the laws of the State of Florida.



**AGENT DON N. REYNOLDS #265
AGENT - MAJOR CRIMES UNIT/HOMICIDE
BREVARD COUNTY SHERIFF'S OFFICE**

SWORN TO and subscribed before me this 24th ²⁰¹² day of March 2012.


JUDGE IN AND FOR BREVARD COUNTY