

IN THE COUNTY/CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL
CIRCUIT

IN AND FOR BREVARD COUNTY, FLORIDA

05-2012-CF-35337-A XXX-XX

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FILED IN VIERA-13
CLERK OF CIR. CT.
BREVARD CO. FL.
MAR 19 P 3:02
MITCH NEEDELMAN

AFFIDAVIT FOR SEARCH WARRANT
RESIDENCE

STATE OF FLORIDA
COUNTY OF BREVARD
BEFORE ME,

Charles D. Crawford

in and for Brevard County, Florida, personally came Agent Don N. Reynolds of the Brevard County Sheriff's Office, who being duly sworn deposes and says: That affiant has reason to believe and does believe that certain premises and curtilage located in Brevard County, Florida, described as follows:

The target of this search warrant is a single story apartment, located at 20 Circle Avenue #1, Melbourne, Brevard County, Florida. To arrive at the target, 20 Circle Avenue #1, Melbourne, Brevard County, Florida, one would begin at the intersection of Brevard Drive and Babcock Street. One would travel north on Babcock Street approximately .22 miles to the intersection with Circle Avenue. One would turn right (east) onto Circle Avenue and travel approximately .05 miles to the target of this search warrant 20 Circle Avenue #1, Melbourne, Brevard County, Florida. 20 Circle Avenue #1, Melbourne, Brevard County, Florida is located on the north side of Circle Avenue. The number 20 is clearly posted on the southeast corner of the building.

20 Circle Avenue #1 is further described as a one story single multifamily apartment building. The structure is white in color with pink trim. The front door of 20 Circle Avenue #1, Melbourne, Brevard County, Florida faces to the east. The south side of the building 20 Circle Avenue #1, Melbourne, Brevard County, Florida and faces toward Circle Avenue. One must enter a common breeze way dividing the apartment buildings of 20 Circle Avenue, Melbourne, Brevard County, Florida and 22 Circle Avenue. 20 Circle Avenue #1, Melbourne, Brevard County, Florida is the first apartment on the left (west) once one enters the breezeway dividing the buildings.

There is now being kept in, on, at or within said premises or curtilage thereof, the only computer in the residence described as being gray/black desk top home computer that contains information which would support and establish the involvement of Brandon Lee Bradley in the commission of felony crimes, to wit: 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, and would establish that said crimes have been committed in



D. FARRIS

Brevard County, Florida.

THE FACTS tending to establish the grounds for this application and the probable cause of Affiant 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 lines, 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.

On Friday, March 09, 2012, at approximately 0827 hours, Agent Wayne Simock and Agent Joseph Martin picked up Inmate Wilson Martin Valentin, DOB 07/11/1988 from the Brevard County Jail. On Tuesday, March 6, 2012, Melbourne Police Department had arrested Inmate Valentin after they executed a Search Warrant at 20 Circle Avenue, Apartment #1, Melbourne, Brevard County, Florida.

At approximately 0910 hours, Agent Wayne Simock, Agent Joseph Martin, and Inmate Wilson Valentin arrived at the Brevard County Sheriff's Office, Criminal Investigation Division, located at 340 Gus Hipp Boulevard, Rockledge, Brevard County, Florida, 32940.

At approximately 0920 hours, while using a digital recorder, Agent Joseph Martin read Inmate Wilson Valentin Miranda Warning with Agent Wayne Simock present. After reading the Miranda Warning form, Inmate Wilson Valentin signed the form and waived his Miranda Rights and elected to provide a statement.

During a sworn digitally recorded interview, Inmate Wilson Valentin said on the early morning hours of Tuesday, March 6, 2012, he was contacted by Mr. Brandon Lee Brantley in regards to his desire to burn (record) an audio track. At the time, Andrea, Mr. Brandon Lee Brantley girlfriend was accompanying him. When asked, Inmate Wilson Valentin said the audio track was labeled "Death Trap" and was burned (recorded) directly to his computer. When questioned, Inmate Wilson Valentin said his computer, a PC (black/gray in color) consisting of a tower, monitor, and speakers was adjacent to a couch located within 20 Circle Avenue.

When the Melbourne Police Department ^{served a} ~~severed~~ the search warrant on March 6, 2012, he was subsequently arrested and the above described computer was still in the residence of 20 Circle Avenue, Melbourne, Brevard County, Florida.

During the interview, Agent Wayne Simock and Agent Joseph Martin played a video for Inmate Wilson Valentin, which was collected from the internet. Inmate Wilson Valentin acknowledged he created (engineered) the audio to the video. Within the video, there are multiple individuals including Inmate Wilson Valentin and Mr. Brandon Lee

Brantley. The video describes criminal activity, to include but not limited to, violence, home invasion robbery, carjacking, and kidnapping.

Based on the above sworn statements given by the witnesses in this investigation, there is probable cause to believe there is evidence contained within said residence, which was occupied by Brandon Lee Bradley and Andria Michelle Kerchner hours prior to 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.

Your Affiant with such lawful assistance as may be necessary, requests that a search be made of said premises, in the daytime or nighttime, or on Sunday, as the exigencies of the circumstances may demand, to protect initial concealment of approaching law enforcement, to facilitate entry into the premises, and to prevent the concealment and/or the destruction of evidence by subjects within the premises. The search to include the residence, outbuildings on the property, curtilage, and any vehicles located on the premises or curtilage, which are reasonably believed to be connected to which would support and establish the involvement of Brandon Lee Bradley in the felony crimes, to wit: 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, have been committed in Brevard County, Florida.

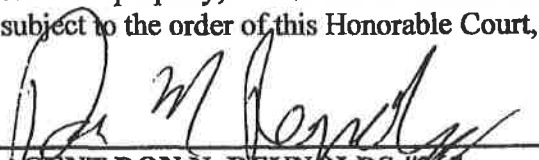
Your Affiant therefore, requests to seize a single gray/black desk top home computer from said residence.

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

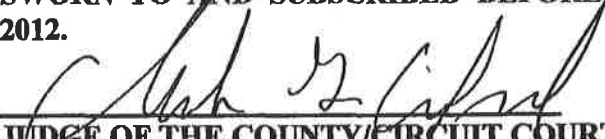
Your Affiant, Agent Don N. Reynolds, has been employed as a Brevard County Sheriff's Deputy for Sixteen years. Prior to this Your Affiant was a Brevard County Reserve Deputy for two years. Your Affiant is a certified law enforcement officer in the state of Florida, his certification having been obtained 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.

THEREFORE, Your Affiant makes this Affidavit and prays for the issuance of a **Search Warrant** in due form of law for the search of the above described **premises** for the said property, heretofore described and for the seizure and safe keeping thereof, subject to the order of this Honorable Court, by the duly constituted officers of the law.


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

SWORN TO AND SUBSCRIBED BEFORE ME THIS 9th DAY OF March,
2012.


JUDGE OF THE COUNTY/CIRCUIT COURT
IN AND FOR BREVARD COUNTY, FLORIDA