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**CIRCUIT/COUNTY COURT OF THE 18TH JUDICIAL CIRCUIT IN AND FOR
BREVARD COUNTY, FLORIDA**

AFFIDAVIT FOR SEARCH WARRANT

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

STATE OF FLORIDA
COUNTY OF BREVARD

CLERK OF COURT
VICTIM BRANCH

2012 APR 30 AM 10:09

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BEFORE ME, the Judge of the Circuit/County Court of the 18th Judicial Circuit, in and for Brevard County, Florida, personally appeared Agent Don N. Reynolds of the Brevard County Sheriff's Office, who being first duly sworn, deposes and says: That the Affiant is a citizen of Brevard County, State of Florida, and that he has reason to believe and does believe that the data contents of a cellular phone is evidence of 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, which have been committed in Brevard County, Florida.** The items are described as being a Samsung Metro PCS black in color cellular phone having a serial number of 9900023318449, a Kyocera black in color cellular phone bearing serial numbers 268435459901878664, and a black and silver polaroid digital camera model number PMP283C-4. These three items were seized during the execution of a vehicle search warrant issued by the Honorable Judge Charles Crawford and executed on March 8, 2012, following the arrest of suspects Brandon Lee Bradley and Andria Kerchner in a 1996 white Ford Explorer bearing vehicle identification # 1FMDU32X4TUA77965.

The two cell phones and digital camera are located as follows, to wit:

The Brevard County Sheriff's Office, Criminal Investigation Division, located at 340 Gus Hipp Boulevard, Rockledge, Florida.

The facts tending to establish grounds for this application and the probable cause of 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



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the Econo Lodge. The victim further indicated the two fled the area in a white Ford Explorer 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.

At approximately 1116 hours, officer for the Melbourne Police Department reported last seeing a white Ford SUV in the area of 4100 Carolwood Dr. A subsequent search of the area by Melbourne Police Officers raised the suspicion of a homeowner, Mr. Gerard Weber of 4075 Janewood Lane. While inquiring about the presence of law enforcement in his backyard, Mr. Weber noticed a white Ford Explorer parked facing northward in his driveway with the driver's door open. He subsequently went into the garage and noticed a white female had unlawfully made entry without permission and was attempting to conceal herself behind shelving. The female stated she was looking for gas, whereas, Mr. Weber stated he immediately exited and went to raise the attention of law enforcement.

The white Ford Explorer fled the scene and law enforcement pursued affecting an arrest in the area of Parkway Drive and Turtle Mound Rd. Following the arrest of Brandon Lee Bradley and Andria Kerchner two cell phone and a digital camera were observed in the Ford SUV. These items were seized during the execution of a vehicle search warrant issued by the Honorable Judge Charles Crawford and executed on March 8, 2012. The aforementioned items have been continuously in the custody and control of the Brevard County Sheriff's Office since that date. 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. Phone records associated with Brandon Bradley corroborated outgoing and incoming calls to a phone belonging to him.

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 Samsung Metro PCS black in color cellular phone having a serial number of 9900023318449, a Kyocera black in color cellular phone bearing serial numbers 268435459901878664, and a black and silver polaroid digital camera model number PMP283C-4, which were located inside the

1996 white Ford Explorer, 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.

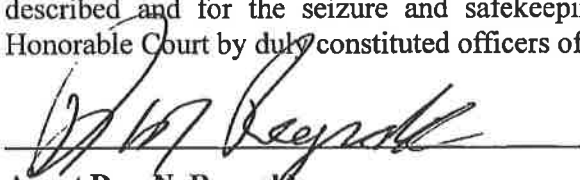
Your Affiant does have knowledge that both the sent and received electronic text messages and photographs stored on the cellular phone can be retrieved at a later date. The Affiant has knowledge that the text messages which are sent from the users cellular phone to another cellular phone are stored in the "outbox", text messages received are stored in the "inbox". Your Affiant has knowledge that the messages both sent and received are stored in the cellular phones' memory and will remain there even if the power and or service is shut off to the cellular phone. This same application also applies to photographs, which are taken by a cellular phones and digital camera as well as sent and received between cellular phones. The incoming photographs depending on the type of cellular phone are also stored in the "inbox" while outgoing photographs are stored in what is referred to as a media gallery. As with text messages the images are stored on the device until manually deleted or the memory is small enough to delete old messages as new ones are received. Your Affiants above knowledge is based upon investigative experience and training.

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.

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WHEREAS, 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 said cell phone heretofore described and for the seizure and safekeeping thereof, subject to the order of this Honorable Court by duly constituted officers of the law.



Agent Don N. Reynolds
Brevard County Sheriff's Office

SWORN AND SUBSCRIBED BEFORE ME

THIS 9th DAY OF April, 2012



**JUDGE OF THE CIRCUIT/COUNTY COURT OF THE 18TH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA**