



STETSON LAW

**Sixteenth Annual  
National Pretrial Competition**  
Stetson University College of Law

**Competition Problem**

*United States of America*

*v.*

*Jamie Lawton*

Case No: 2023-CR-812

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Stetson University College of Law

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## **Stipulations by the Parties**

The following has been stipulated to by the parties:

1. All exhibits are complete, accurate, and authentic.
2. All reports, affidavits, witness statements, and exhibits are complete, accurate, and true copies of the originals.
3. The white powdery substance found in the warehouse at 900 49<sup>th</sup> Street Petersburg, Stetson has been tested and confirmed to be cocaine. The total weight of the cocaine found was 31 pounds.
4. Judicial notice has been taken that a second charge of Driving Under the Influence within 12 months of a first conviction for Driving Under the Influence constitutes a 3<sup>rd</sup> Degree Felony in the State of Stetson.
5. The Government will call Officer Taylor Griffin and Lieutenant Samy Vann as witnesses.
6. The Defense will call Jamie Lawton and Kell Halstead as witnesses. Kel Halstead has been indicted for violating 21 U.S.C. § 841(a)(1), (b)(1)(A) - Possession with intent to distribute 5 kilograms or more of cocaine – 1 count; and 21 U.S.C. § 846, 841(a)(1), (b)(1)(A) - Conspiracy to distribute 5 kilograms or more of cocaine. Kel Halstead may not, and will not, invoke the Fifth Amendment during the suppression hearing.
7. All witnesses are gender neutral and can be played by students of any gender or non-binary identity. No argument may be made that an advocate playing a witness role does not match the description contained in the case file.
8. No objections may be made based on the Confrontation Clause. All Confrontation Clause objections are preserved pending the outcome of the motion raised in this case file.
9. Following the arraignment, the defense filed a Motion to Suppress on two Fourth Amendment grounds, illegal entry and unlawful search. In accordance with the Court Order issued during the arraignment hearing, the parties must file their respective memorandums of law in support of, and opposition to, the Motion to Suppress on or before September 1, 2023.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF STETSON**

UNITED STATES OF AMERICA

vs.

JAMIE LAWTON

CRIMINAL NO: 2023-CR-812

**VIOLATIONS:**

21 U.S.C. § 841(a)(1), (b)(1)(A)  
(Possession with intent to distribute 5 kilograms or more of cocaine – 1 count)

21 U.S.C. § 846, 841(a)(1), (b)(1)(A)  
(Conspiracy to distribute 5 kilograms or more of cocaine)

18 U.S.C. § 342(b) (Operation of a motor vehicle while under the influence of alcohol and/or drugs by a person who holds a federally issued common carrier license)

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**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1:** On June 8, 2023, in the Middle District of Stetson, the defendant, JAMIE LAWTON, did knowingly have actual or constructive possession of five kilograms or more of cocaine, with the intent to distribute said cocaine, in violation of Title 21 of the United States Code, Sections 841(a)(1), (b)(1)(A).

**COUNT 2:** From on or about January 1, 2023, through on or about June 8, 2023, in the Middle District of Stetson, the defendant, JAMIE LAWTON, did conspire with one or more persons, to wit: KELL HALSTEAD, to possess with the intent to distribute five kilograms or more of cocaine, in violation of Title 21 of the United States Code, Sections 846, 841(a)(1), (b)(1)(A).

**COUNT 3:** On June 8, 2023, in the Middle District of Stetson, the defendant, JAMIE LAWTON, did operate a motor vehicle while under the influence of alcohol and while in possession of a federally issued common carrier license, to wit: federal license to operate a locomotive, rail, or train carrier used to transport passengers and/or products in interstate commerce, in violation of Title 18 of the United States Code, Section 342(b).

A TRUE BILL OF INDICTMENT:

[signed foreperson – identity sealed for protection]

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FOREPERSON

July 7, 2023

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

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JAMIE LAWTON

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vehicle while under the influence of alcohol  
and/or drugs by a person who holds a  
federally issued common carrier license)

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**ARRIGNMENT TRANSCRIPT**

July 13, 2023, 9:00 a.m.  
Courtroom 11  
United States District Courthouse  
Middle District of Florida

The Honorable Elizabeth Boaling, Presiding

Attorney for Government:  
Tammy Wise, Assistant United States Attorney

Attorney for Defendant:  
Ashtyn Noa, Assistant Federal Defender

**AUSA Wise:** The first case on the docket is 2023-CR-812.  
United States of America v. Jamie Lawton.

**Judge Boaling:** Marshall, please bring the defendant out.  
[Sheriff opens door].

**Judge Boaling:** Good morning. What's the Government's  
position on bond?

**AUSA Wise:** Remand, Your Honor. This defendant is alleged  
to have been trafficking with intent to distribute 31 pounds of  
cocaine and conspiring with at least one other person to do so.  
Even though the defendant has no criminal history, the defendant  
is facing a significant period of incarceration and is a flight  
risk.

**Judge Boaling:** Attorney Noa?

**Attorney Noa:** Remand is excessive, Your Honor. Especially  
in light of the fact that the Government secured their evidence  
against my client in violation of the Fourth Amendment. I  
intend to file a motion to suppress that raises two issues  
related to two unconstitutional acts that resulted in the  
unlawful discovery of the evidence against my client.  
Specifically, that a Petersburg Patrol Officer illegally entered  
my client's residence, and then illegally searched my client's  
residence, which resulted in the seizure of the cocaine in  
question. If my suppression motion is granted on either one or  
both grounds, the government will have to dismiss the charges as



they will have no evidence whatsoever against my client. As such, I ask my client be ROR'd - excuse my informality, released on their own recognizance - and we schedule this case for a suppression hearing as soon as possible.

**Judge Boaling:** I understand and appreciate your representations, Ms. Noa; however, we need to take this one step at a time. At this point there is no motion pending and this court has not heard any sworn testimony about the circumstances of the entry or search that led to this arrest. I am aware, however, of the charges returned by the Grand Jury in the defendant's indictment and they are quite serious. Given the allegations, I have concerns about potential access to cash and risk of flight. I am going to remand the defendant at this time, without prejudice. File your motion to suppress with the Clerk on your way out today, but I'll give you more time to file a supporting memorandum of law on the issues you indicated. The Government, I presume, will file a motion in opposition?

**AUSA Wise:** Absolutely, Your Honor.

**Judge Boaling:** Fine. I want all memorandums filed by September 1, 2023. We'll set the case down for an evidentiary hearing and oral argument between October 12<sup>th</sup> and 15<sup>th</sup>, 2023. Ms. Wise, I know you are new to your office, so I remind you that although the defense is the movant in this case as they are making the motion to the court, in a suppression hearing the

Government has the burden to prove that any and all searches were lawful and in compliance with the United States Constitution and the federal case law interpreting the extent and application of the Fourth Amendment. I expect both parties to fully analyze and support any legal issues raised with appropriate case law from Federal jurisdictions that are persuasive or controlling on this court. After the issues are fully briefed and we've had a complete evidentiary hearing and oral argument, I'll issue a written decision and, depending on my ruling, will re-consider bond.

**AUSA Wise:** Yes, Your Honor.

**Attorney Noa:** Understood, Your Honor.

**Judge Boaling:** So Ordered.

## Applicable Statutes

### State of Stetson

#### **14-227a – Driving under the Influence.**

(1) A person is guilty of the offense of driving under the influence if the person is driving or in actual physical control of a vehicle within this state and;

(a) The person is under the influence of alcoholic beverages to the extent that the person's normal faculties are impaired, or drives a vehicle with a blood alcohol content of .08 or higher; or

(b) The person is under the influence of drugs to the extent that the person's normal faculties are impaired.

(2) (a) Except as provided in paragraph (b), any person who is convicted of a violation of subsection (1) commits a first-degree misdemeanor.

(b) Any person who is convicted of a second violation of this section for an offense that occurs within three years after a prior conviction for a violation of this section commits a felony in the third degree.

#### **14-215 – Operation while registration or license is suspended or revoked. Penalty.**

...

(c) (1) Any person who operates any motor vehicle during the period such person's operator's license or right to operate a motor vehicle in this state is under suspension or revocation on account of a violation of section 14-227a ... is guilty of a misdemeanor and shall be fined not less than five hundred dollars or more than one thousand dollars and imprisoned not more than one year, and, in the absence of any mitigating circumstances as determined by the

court, thirty consecutive days of the sentence imposed may not be suspended or reduced in any manner.

**14-223 – Failing to stop when signaled. Increasing speed to escape or elude officer. Penalty.**

(a) Whenever the operator of any motor vehicle fails promptly to bring a motor vehicle to a full stop upon the signal of any officer, either in uniform or in a marked police vehicle, shall be deemed to have committed an infraction and be fined no more than fifty dollars.

(b) No person operating a motor vehicle, when signaled to stop by an officer in a police vehicle using an audible signal device or flashing or revolving lights, shall increase the speed of the motor vehicle in an attempt to escape or elude such police officer. Any person who violates this subsection shall be guilty of a misdemeanor in the first degree, except that, if such violation causes the death or serious physical injury of another person, such person shall be guilty of a felony in the third degree.

**14-147 – Failure to display plate. Penalty.**

(a) Anyone who owns or operates a motor vehicle without a license plate, having been issued by a lawful authority, visibly affixed to both the front and back of the vehicle shall be deemed to have committed an infraction and be fined no more than fifty dollars.

**United States Code**

**18 U.S.C. § 342 – Operation of a common carrier under the influence of alcohol or drugs.**

**Operation of a motor vehicle under the influence of alcohol or drugs while possessing a common carrier license. Penalty.**

(a) Whoever operates or directs the operation of a common carrier while under the influence of alcohol or any controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. § 802)), shall be imprisoned not more than fifteen years or fined under this title, or both.

(b) Any person who possesses a federally issued common carrier license and operates any motor vehicle while under the influence of alcohol or any controlled substance, shall be subject to the penalties as set forth in the governing state statute and, if convicted, have their federally issued common carrier license permanently revoked.

**21 U.S.C. § 841 – Controlled Substances. Penalty.**

**(a) Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally—**

(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; or

(2) to create, distribute, or dispense, or possess with intent to distribute or dispense, a counterfeit substance.

**(b) Penalties -** Any person who violates subsection (a) of this section shall be sentenced as follows:

(1) (A) In the case of a violation of subsection (a) of this section involving—

...

(ii) Five kilograms or more of a mixture or substance containing a detectable amount of cocaine;

...

such person shall be sentenced to a term of imprisonment which may not be less than ten years or more than life.

**21 U.S.C. § 846 – Conspiracy. Penalty.**

If two or more persons intentionally agree to commit any of the acts prohibited by 21 U.S.C. §§ 841-843, and take some overt act in furtherance of the agreement, such persons shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the conspiracy.

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**TRANSCRIPT OF GRAND JURY PROCEEDING**

July 6, 2023

TAYLOR GRIFFIN, having been first duly sworn, testified as follows:

By Assistant United States Attorney:

Q: Good afternoon, can you please state your name for the record?

A: Yes, my name is Taylor Griffin. Common spelling.

Q: How old are you?

A: I'm 24.

Q: What do you do for a living?

A: I'm a Patrol Officer for the Petersburg Police Department.

Q: How long have you been with PPD?

A: Almost 3 years.

Q: Are you assigned to any particular division within PPD?

A: Yes, I'm assigned to the Traffic Enforcement Division.

Q: What does a Patrol Officer in the Traffic Enforcement Division do?

A: We are the front line of DUI protection for the community. We keep everyone safe. Without us, our streets would be anarchy. Have you seen the amount of DUI videos on YouTube? It's insanity. Such a dangerous and unnecessary crime. My best friend was actually killed by a drunk driver in high school. Anyway, a couple years ago the PPD was given monetary grants from MSDD, that's Mothers Stopping Drunk Driving, and FHSA, that's the Federal Highway Safety Administration for DUI enforcement. Bottom line, these organizations and agencies fund our overtime pay to keep the streets DUI free.

Q: How do you go about enforcing DUI laws in Petersburg?

A: I'm assigned to patrol a specific area to lookout for suspicious or illegal activity, particularly DUI's. If I see criminal activity afoot, particularly a suspected DUI, I stop it. My goal is to someday become an Accident Reconstructionist who investigates and makes arrests in DUI homicides, so I am trying to get as much experience as possible and really make a name for myself within the PPD. Of course, as a Patrol Officer, I can also respond to reports of emergencies, and I serve arrest warrants.

Q: Did you have to get any kind of education or training to do that?



A: Yes.

Q: What kind of education or training did you receive?

A: I did Basic Training with The Law Enforcement Academy before becoming an officer. Then I had to pass the Stetson State Officer Certification Examination during my first 90 days on the job. I also took a six-week DUI investigation course and received a certificate of completion in the summer of 2021. Then there was FTP.

Q: What is FTP?

A: It stands for Field Training Program. It's a probationary training and evaluation program where rookies ride along with Field Training Officers, or "FTOs", until we are ready to go solo. It lasts about 6 months. I've been solo for a while now though. At least a year or two.

Q: Let's talk about the incident in question. Were you working on June 8, 2023?

A: I was, that's when I saw the defendant drunkenly throw up while driving a red truck.

Q: We'll get to that, but first, where were you?

A: I was patrolling solo in Petersburg County. Specifically, I was traveling southbound on 49<sup>th</sup> Street.

Q: What time was this?

A: Around 16:00, maybe a little after.

Q: What was the weather like?

A: It's Stetson, it's hot. It's always hot and humid.

Q: Fair enough. Was the sun out?

A: Yes. It was June in Stetson; the sun doesn't set until like 21:00 that time of year.

Q: Any rain or thunderstorms on that day?

A: Nope, which is unusual for Stetson summers.

Q: Let's talk a little bit about 49<sup>th</sup> Street. How many lanes does it have?

A: Generally, it's a four-lane road. Two lanes for traffic on each side, with a double yellow line in the middle. But at various intersections there can be additional turn lanes and bike lanes.

Q: Earlier you mentioned you saw a red truck, when did you see it?

A: When I got to the intersection of 49<sup>th</sup> and Raymond.

Q: Showing you Exhibit 1. What is this?

A: That's the intersection of 49<sup>th</sup> and Raymond. You just can't see the traffic light in this picture, but it's there. 49<sup>th</sup> is the road Exhibit 1 depicts, and Raymond runs perpendicular to 49<sup>th</sup>, like across the bottom of Exhibit 1. I was traveling toward Raymond, in the direction of this straight arrow on Exhibit 1.

Q: On June 8, 2023, what lane were you in when you saw the red truck?

A: I was in the center lane. The one right here in the middle with the straight arrow heading toward the bottom of Exhibit 1.

Q: What Lane was the red truck in?

A: It was in the right lane. Not the far right turn lane, but in

the farthest right lane that continue to go straight. In other words, the lane directly to the right of the middle lane I was in.

Q: How would you say traffic was at that time?

A: It was moderate. Rush hour was just starting.

Q: Were there any other cars at the intersection other than your patrol car and the red truck?

A: Yeah, there were four other cars besides ours.

Q: Where were they in relation to you and the red truck?

A: The red truck was the first car sitting at the light in the right lane, with one car behind it. There were two cars in front of me, so I was the third car back from the light, in the center lane. There was also one car behind me in the center lane.

Q: Do you recall the make and model of the car that was behind the red truck in the right lane?

A: It was a blue Honda Civic.

Q: Do you recall what kind of cars were in front of you?

A: I couldn't tell you the make and model of the first car in front of the light in my lane, but it was a sedan. Not an SUV. Then directly in front of me was a silver Ford Focus.

Q: What kind of car is your patrol vehicle?

A: Ford Explorer SUV.

Q: What make and model was the red truck?

A: It was a red Chevrolet S10 pickup truck.

Q: Two door or four door?

A: Four door.

Q: Showing you Exhibit 2. Does this picture fairly and accurately represent the red truck you saw on June 8, 2023?

A: Yes. This isn't the exact truck, but it's very close in size and look. Same make and model and obviously jacked-up like the truck I saw on June 8, 2023.

Q: What do you mean by jacked-up?

A: That's just a street-term for when after-market suspension is put on a car to raise it further off the ground than the manufacturer originally built it.

Q: So, what did you see at the intersection?

A: Like I said, when I came to a stop at the red light, I saw the defendant throwing up out of the driver's side door of a red truck.

Q: Did you know who the defendant was at that point?

A: No. At that point I thought it was Kevin James.

Q: Who is Kevin James?

A: A real piece of work. He's a local who can't seem to stop getting into trouble with the law.

Q: How do you know Mr. James?

A: I've arrested him a number of times. Drunk and disorderly, possession of paraphernalia. I just got him for a DUI back in 2021.

Q: What does Mr. James look like?

A: He's kind of average. About 5'9", brunette, maybe 170 pounds or so.

Q: Is there anything distinct about him that you can think of?

A: No, nothing I can think of. He's pretty run of the mill.

Q: Alright, well why did you think it was Mr. James in the red truck on June 8<sup>th</sup>?

A: I recognized that truck as his.

Q: How did you recognize it?

A: It's a jacked-up, red Chevy S10 with a little bumper sticker that has a stick figure peeing on the Ford logo. It's kind of hard to forget a bumper sticker like that.

Q: Couldn't you just run the license plate to confirm it was James' truck?

A: Actually, there was no license plate displayed on the back of the truck, which is a motor vehicle infraction in the State of Stetson. I could have pulled the driver over for just that traffic offense right then and there, but given the puking, I believed further investigation was necessary.

Q: You keep saying the driver was puking, but how could you tell that's what the driver was doing?

A: I mean, the driver opened his door at a red light, leaned out of the truck toward the ground, and I saw some liquid come out of his mouth. I guess I can't say for sure he wasn't just rinsing his mouth and spitting, but it looked like he was puking because his

body kind of heaved. It looked more forceful than just spit.

Q: How many times did the driver, in your words, heave?

A: Just once.

Q: Could you see how much liquid came out of the driver's mouth?

A: It looked like a small amount of vomit. Not just a spit, but also not violently spilling his guts on the road.

Q: Did the driver fall or stumble out of the car at all as this was happening?

A: No.

Q: As you were watching this, could you tell what the driver looked like?

A: I couldn't see the driver's face because the driver leaned their face toward the front of the truck as they were throwing-up, as opposed to leaning out sideways or even backward, which would have given me a clear view of their face. However, the driver was clearly an average-size person that matched James' build. The driver's hair was a bleached blonde color. A terrible fake dye job. It was pulled back in one of those man buns. The hair looked kind of stringy and straight but pulled back into a bun. The driver didn't have curly hair.

Q: What's a man bun?

A: A tucked-in ponytail in the center of the back of the head.

Q: Does Kevin James have a man bun?

A: No, when I last saw him he had stringy straight hair in a shaggy cut, but I figured his hair grew out.

Q: What color was Kevin James' hair when you last saw him prior to this incident?

A: A light brown color.

Q: And when had you last seen him?

A: At his DUI plea, which was like six months prior to the date in question. Plenty of time for his hair to grow out.

Q: But you said the driver had blonde hair?

A: Yes, but it didn't look to me like a natural blonde. I figured James dyed it. I knew his driver's license had been suspended because of the DUI conviction. And, as I mentioned, the truck was missing a back plate, so I believed James removed the back plate and dyed his hair to avoid getting caught for Operating with a DUI Suspension, which carries mandatory jail time.

Q: Did the truck have a front plate?

A: I couldn't see it at the time because I was behind the truck, but yes, much later in the investigation, I observed that there was a front plate on the truck. But it's still illegal to not display a plate on both the front and back of the vehicle.

Q: During your observations of the driver at the intersection of Raymond and 49<sup>th</sup>, could you at least tell if the driver was a man or a woman?

A: From the angle I had, no. Like I said, the driver leaned forward and he threw up, so all I could see was the back of the head, shoulders, and upper back. The build was similar to that of James, but I'll admit that James isn't exactly a huge guy.

Q: So, after you see what you believed to be puking, what does the

driver do?

A: Shut the door and started to drive away.

Q: How long was the door open?

A: About ten seconds.

Q: Earlier you mentioned the light was red, was it still red when the driver took off?

A: No, it had been green for a second. The driver was actually slow to get going.

Q: What do you mean?

A: Well the light turned green while the door was open, so the driver shut the door and then it took about three or four seconds for the driver to get going.

Q: What did you do next?

A: I followed the truck for a bit as it headed straight on 49<sup>th</sup> street.

Q: Could you tell how fast the truck was going?

A: Not exactly, but I know it was under the speed limit.

Q: How?

A: The speed limit on 49<sup>th</sup> is 55 mph. I had moved into the right lane and was following behind him after the light turned green. There was one car between us, but I was pacing the truck at about 45-50 mph. The truck speed kept fluctuating and the car between us switched lanes, so then I was directly behind the truck at that point.



Q: How could you tell the truck speed was fluctuating?

A: Based on looking at my calibrated speedometer as we were driving.

Q. Showing you Exhibit 3. What is that?

A: That's a copy of my cruiser's speedometer calibration. The Vin# matches my car and the PPD gave this to me to provide to your office in response to a subpoena in this case.

Q: Did you see the truck's brake lights come on at any point as the speed was fluctuating?

A: No, no brake lights. It was just like the driver was taking their foot on and off the gas pedal.

Q: What happened next?

A: I continued to follow the truck and I saw it drift into the emergency lane a couple of times.

Q: Did you see anything else as that was happening?

A: It looked like the driver was hunched over and reaching toward the passenger seat.

Q: What do you mean?

A: I could see the driver's torso leaning to the right and the driver's right arm reaching toward the passenger seat area.

Q: Could you tell what the driver was doing?

A: No, just that the driver appeared to be reaching toward the right side of the car. This always puts officers on alert because we are trained that a driver who reaches around the passenger

compartment - something we call "furtive movements" - can be indicative of hiding drugs, weapons, or other contraband.

Q: How closely were you following the truck at that point?

A: I was probably a car length or maybe a car length and a half back.

Q: Were you in a marked car?

A: Yes, my SUV cruiser has the prominent Petersburg Police Department insignia on the side, plus a roof rack with lights, sirens, and a push bar on the front. A standard marked police SUV.

Q: After the truck drifted into the emergency lane, what did you do?

A: I put on my lights to pull the driver over.

Q: Did you turn your sirens on?

A: No. I didn't think it was necessary. I figured the driver would stop when he saw the lights.

Q: Did you turn your dash camera video on?

A: No.

Q: Why not?

A: Well, officers can't directly turn the dash camera on. The dash camera turns on automatically when the sirens are activated, and the dash camera recording will pull data from 30 seconds prior to the start of the sirens. Basically, the dash camera is always on, but the recordings aren't stored for more than a minute until the sirens are activated. When the sirens are activated, the server will automatically save the 30 seconds of recording prior

to the sirens being activated.

Q: What were you pulling the driver over for?

A: Between the vomit, the swerving, and the inconsistent speed, I had the driver, who I believed to be Kevin James, for a second DUI within three years, a violation of probation, as well as Operating a Motor Vehicle while under a DUI suspension and failure to display plates! This was going to be a bigtime arrest. It's why I do what I do! Protect and serve!

Q: But Officer, did Jamie Lawton have a prior DUI conviction?

A: No, but at this point I hadn't fully seen the driver's face, just the profile.

Q: Was Jamie Lawton on probation in June 2023?

A: No, but again, I figured this was Kevin James and he was on probation at that time so this would be a violation of his probation.

Q: Was Jamie Lawton's license suspended in June 2023?

A: No.

Q: Ok, so after you put on your lights did the Driver stop?

A: No, he kept going for about three miles.

Q: Did you turn your sirens on in those three miles?

A: No, I guess it slipped my mind. I was getting ready for a chase.

Q: A chase? Did the driver accelerate at all during those three miles?

A: Not to the point of engaging me in pursuit or trying to elude me, but he increased speed by about 5 mph. So he was going about the speed limit at that point.

Q: What happened next?

A: The driver turned into a parking lot next to what looked like an abandoned-looking warehouse, parked, got out, and quickly walked inside.

Q: Did you follow the driver inside?

A: Not immediately. While turning into the warehouse I radioed for back up at 900 49<sup>th</sup> Street North. That's when I got an earful from Lieutenant Vann that 900 49<sup>th</sup> was theirs and that I shouldn't go in.

Q: What do you mean?

A: Lieutenant Samy Vann is the head of the narcotics division and is a TFO, Task Force Officer, which means Vann is deputized by the DEA and can work on federal cases with DEA agents, as well as local law enforcement. While I was on the radio, Vann called my cell phone, which I thought was odd, but I answered. Vann started barking orders not to go in. Vann said the building was under surveillance by a joint state and federal DEA task force because at least one person was purporting to live there and use it as a stash house to move large quantities of cocaine. Vann said they had been surveilling the area for a couple months building a case, so they considered the warehouse to be "theirs" and they didn't want me to blow their operation by going in.

Q: Did you go in?

A: Yeah, but I had probable cause to get the guy for a DUI and

other charges and I wasn't going to miss that chance because the narcotics division thinks they are better than traffic enforcement. Plus, the longer I waited the more likely this guy's BAC was gonna drop.

Q: What do you mean by BAC drop?

A: We learned in our DUI training that a person's BAC - blood alcohol content - will start to drop about 60 minutes after that person stops drinking because their body metabolizes the alcohol. It's not rocket science, basically when someone stops drinking, they will start to sober up as the body metabolizes the alcohol in their system. Anyone who drinks, or has been around someone who drinks, knows this. And the more time that passes, the more likely we are to lose evidence of what exactly the driver's blood alcohol content was during operation of the motor vehicle. A BAC of .08 is the legal limit to drive, so it's important to quickly apprehend a DUI suspect and obtain a breath, blood, or urine BAC test as soon as possible. Of course, drivers can always refuse those tests, but we use those refusals against them because who would refuse the test if they weren't drunk? And I don't know what Vann was so upset about anyway because the driver could have been getting rid of whatever evidence the narcotics team was surveilling for. It was important that I go in immediately.

Q: What do you mean?

A: Isn't it obvious? If the driver saw me following him and there were drugs in the building, the driver would probably try to get rid of them. I was obviously following him with my lights flashing and he disregarded me by continuing to drive. Plus, when I pulled into the warehouse behind him no one else was around, so it was obvious that I could only have been going after him.

Q: Okay. So earlier you mentioned a warehouse, would you recognize it if I showed you a picture?

A: Absolutely.

Q: Okay, I'm showing you Exhibit 4, do you recognize it?

A: Yes, that's the warehouse on 49<sup>th</sup> Street that I followed the defendant to.

Q: Did you see the driver enter the warehouse?

A: Yes.

Q: Through which door?

A: Well you can see here there are two doors, and they each have a "No Trespassing, Private Property" sign on them.

Q: Sorry to stop you, but I'm showing you Exhibit 11. Is this a close-up picture of the sign on those doors?

A: Yes it is.

Q: Were there any other indications that this was private property that you saw while you were there?

A: Not that I saw.

Q: Showing you Exhibit 12. Did you see this at all when you were there?

A: No.

Q: OK. So please go back to what you saw when the driver entered the warehouse.

A: Well, the driver kind of stumbled out of the truck and walked

fast toward the door. The driver was hunched over and kind of like grabbing their lower stomach area while they walked quickly toward the door. The driver didn't look back at me at all - just headed straight for the door. I saw the driver digging in their pocket as they ran up to this big metal-looking door on the left in Exhibit 4. The driver put the key in the door, opened it, and ran inside.

Q: Ran?

A: Yeah, the driver bent over even more after they opened the door and kind of ran inside. I thought the driver was really trying to elude me at this point. It was frustrating. The driver was moving so fast they didn't even close the door behind them. It was just wide open and swinging in the wind.

Q: How far away were you at this point?

A: Probably about 40 yards. Actually, this picture, Exhibit 4, is accurate to where I was because I snapped it with my cell phone as I was approaching. Wanted to document my actions to keep Vann off my back!

Q: Well did you yell at the driver to stop at that point?

A: No, I was still in my cruiser calling for back-up.

Q: Were there any lights on in the warehouse that you saw before the driver entered?

A: I didn't notice any lights in particular, but the whole warehouse was pretty well lit with natural light.

Q: So, what did you do next?

A: I followed the driver into the warehouse.

Q: Did you stop to knock and announce yourself before entering?

A: Not immediately, but I did in a matter of seconds, when I finally got eyes on the driver again. When I first entered, the door was open, and the suspect was clearly on a mission to get inside fast. Plus, the driver obviously knew I was following him. My lights had been on for miles, and I pulled in behind him in the parking lot. I mean, come on. Plus, this looked like an abandoned building. I definitely didn't think this was anyone's personal residence. I mean look at it!

Q: What did the warehouse look like when you went in?

A: When I got inside it was huge. A giant space that was mostly empty, but I heard voices coming from the area over toward the back right.

Q: Showing you Exhibit 5. Looking at this picture, where did you hear the voices coming from?

A: Through this open area in the wall over here on the middle-right side of Exhibit 5. From the angle I had, I couldn't see anyone at that point, but I could hear voices.

Q: Could you please mark that open area in the wall where you heard voices coming from with a yellow arrow?

A: Yes. There you go.

Q: Thank you. We'll mark this as Exhibit 5a. Do you know approximately how far the distance is from the door you entered to that open space in the wall where you heard the voices coming from?

A: Probably about 30 yards give or take. It wasn't very far, but it also wasn't like I walked in and was right on top of the people



who were in there.

Q: So what did you do?

A: I followed the voices and walked over to that opening in the wall.

Q: What did you see next?

A: When I entered that area on the right side of the warehouse, there was like a small, make-shift kitchen on the left. And over toward the right there were some wood shelves and pallets.

Q: Showing you Exhibits 6, 7, and 8. Do these picture fairly and accurately represent what you just described?

A: Yes.

Q: Can you describe how, if at all, Exhibits 7 and 8 relate to each other?

A: Yes. Exhibit 7 was what I was able to see when I looked over to the right while standing in the kitchen area. Exhibit 8 is a picture of the same area, but from the other side of the room. So, visualize it as if I walked along the right side of Exhibit 7 toward the far side of the room and then turned around took a picture of the room from that angle, which is what Exhibit 8 depicts.

Q: Can you please describe where Exhibit 6, the kitchen area, was located in relation to what we see in Exhibit 7?

A: Sure. So when I walked through the area that is marked with the yellow arrow on Exhibit 5a, I saw the kitchen area in the back left corner of the warehouse. And if you are looking at the kitchen from the angle we see in Exhibit 6, what is depicted in

Exhibit 7 would be over to your right. Here, I'll put the exhibits side by side so you can see what I mean. There you go.

Q: Very helpful, thank you. We'll mark that side-by-side description you just gave as Exhibit 9. What else, if anything, did you notice when you entered that area?

A: I know it sounds weird, but I smelled Spaghetti-o's! I grew up on Chef-Boy-RD, so I'd recognize that smell anywhere. Someone was in there cooking, which was strange for what looked like an abandoned building. I also continued to hear two people talking. Their voices were raised. One person, who I know now to be Jamie Lawton, moaned, "I'm gonna puke, I'm so sick!" and the other person said, "Gross - stay away from me! We got a good deal going down tonight and need the cash - get yourself together!"

Q: What happened next?

A: I said loudly, "Good evening, Petersburg Police. I want to speak to you" and pointed at the driver. Both the driver and the other person in the warehouse turned and looked at me and their eyes got really wide. They looked like they were in shock. Fear almost. I realized at this point that the driver of the truck was not Kevin James. But this was still a suspected DUI and I wasn't about to let that slide. However, I also didn't want any type of physical altercation to ensue so I said, "Listen, I don't want any trouble, I just have some concerns about how you - pointing at the driver - were driving back there and believe you might be under the influence of alcohol or drugs based on what I saw."

Q: What happened next?

A: The driver looked at the other person and started to stutter, saying like "Um, what? Well...". The driver seemed frazzled and

then immediately started to apologize saying, "I didn't see you behind me, I'm really sorry, but I'm really sick, I need a doctor."

Q: What did you do?

A: That's when I asked him for his driver's license.

Q: Did he give it to you?

A: Yes, eventually, which is when I learned the driver's name was Jamie Lawton.

Q: What do you mean eventually?

A: After I asked Lawton for the license, I also asked the other person their name and they said "Noneya." I replied, "What was that?" And they said, "Noneya business - get out!" I asked, "Do you live here?" And the second person replied, "No, this is Jamie's place, but it's private property! And I don't like you harassing my friend, so beat it!"

Q: Did you leave at that point?

A: No.

Q: Why not?

A: Because that person didn't live there, so they had no right to tell me to leave. However, I did say that I would leave as soon as I was done with my investigation. During this conversation, I noticed that Lawton had trouble getting his license out. It looked like Lawton was in pain because Lawton was wincing when Lawton reached into the back right pocket of Lawton's pants to get a wallet out. Lawton also kept having to lean against a wall the whole time and was doubling over. I asked if Lawton was alright.

Q: What did Lawton say?

A: Lawton said, "No I'm not, but I'm going to call an ambulance for myself. I want you to leave."

Q: Did you leave at that point?

A: No.

Q: Why not?

A: I had a right to be there because I was investigating a DUI, and at that point they knew the cops were there, so I knew that if I left, it would give them the opportunity to destroy, hide, or move any drugs that were in the building.

Q: Did Lawton appear to be actually sick or like it was an act?

A: Lawton didn't look good; pale face, sweating. But I didn't know if the illness was from alcohol, drugs, or something else. I'm not a doctor. So out of an abundance of caution I radioed for an ambulance. Luckily, McDaniel Medical Center is just a few blocks away, so they were there in less than five minutes.

Q: What happened while you waited for the ambulance?

A: Well like I said, it didn't take too long for the ambulance to get there. However, during that time I noticed the other person in the room kept looking over toward this wooden pallet that was kind of behind a shelf. I wasn't exactly sure what they kept looking at, but it was obvious they were looking at something over in that area.

Q: Showing you Exhibit 7 again. Can you please mark with a blue circle the area where you saw this second person looking?

A: Sure, right here.

Q: Thank you. We'll mark this as Exhibit 7a. What was going through your head at this point?

A: I was definitely on high alert for my own safety at that point because of what Lieutenant Vann had told me. I'm also not an idiot - a drug dealer definitely doesn't want cops around and could get desperate and do something stupid. I slowed my breathing and stayed calm, but definitely kept following that person's eyes. I was worried something could go down. It crossed my mind the other person, or Lawton, might consider reaching for a weapon. There was a lot of stuff in there. A weapon could have been anywhere, and I wouldn't have known it.

Q: So what happened next?

A: I told Lawton I was investigating a DUI and asked where Lawton had come from. Lawton told me it was Lawton's day off and so Lawton was at the pool hall down by Bishop Square. Lawton said Lawton had some jalapeño poppers, but only half a beer because Lawton wasn't feeling very well. Lawton repeatedly said, "I am not drunk." I asked Lawton what Lawton did for a living, and Lawton said, "Train conductor and bar tender. I transport goods and merchandise all over the southeast for large companies. I also tend bar on the side for extra cash." I confirmed this when I later ran Lawton's license. Lawton had no criminal history and was employed by the Federal Government as a railway conductor.

Q: Was there anything you noticed while talking to Lawton?

A: Yes, bloodshot and watery eyes. Based on my DUI training and experience, that's indicative of alcohol consumption.

Q: What about Lawton's breath?

A: It just smelled strongly of mint, like peppermint.

Q: What happened when the ambulance got there?

A: A couple of EMT's checked Lawton out and based on where the pain was and the symptoms, they said Lawton was likely having acute appendicitis. They said Lawton needed to go to the ER right away, and transported Lawton to McDaniel Medical.

Q: How much time passed between when you got to the warehouse and called the ambulance?

A: Not even ten minutes.

Q: Ok. When Lawton was transported to the hospital, did you go with him?

A: Not in the ambulance but I did head to the hospital from the warehouse, after I found the drugs.

Q: Let's talk about that. How did you find them?

A: So remember that area I mentioned that the other person kept looking at? Well, I walked right past it as I was walking out of the warehouse.

Q: Wait, you said you entered the big metal door on the left of Exhibit 4 earlier, so how did you walk past that area you circled in blue on Exhibit 7a on your way out?

A: Simple, can you please show me Exhibit 4 again?

Q: Sure, here you go.

A: Thanks. So, I walked out of this greenish-colored door with

the broken windows. This door was in the far corner of the room we were all standing in. You can see in Exhibit 4 how the left side of the building with the door I originally walked through connects to the right side of the building that has the green-colored door. So, when I was leaving, I walked through this green door with the broken windows, and that's how I walked past the area I circled in blue that this other person kept looking at.

Q: Looking at Exhibit 7, where was the greenish-door in relation to what we see in this picture?

A: It was basically like right over here to the right of the photo. I'll draw a green square where that door was. There you go.

Q: Great, thank you. We'll mark that as Exhibit 7b. What door did the EMT's take Jamie Lawton out of?

A: That same greenish-colored door. I basically followed them out.

Q: OK, so please explain what you saw as you were walking out of the warehouse.

A: As I was walking out of the warehouse I naturally walked closer to the area where the other person was looking because it was in my path to exit the building. Upon getting closer to that area as I was walking toward the door, I immediately saw what looked like the edge of something light-colored wrapped in plastic wrap and packing tape. It was partially covered by a tarp.

Q: How far away from this item wrapped in plastic were you when you first spotted it?

A: About six to eight feet, which was as I was walking out of the building after Lawton had been taken out on the gurney.

Q: At that time, how much of the package could you see that wasn't covered by the tarp?

A: About three inches thick by about four inches in length.

Q: Well what in particular about the three by four inches of plastic wrap that you saw led you to believe this was a package of cocaine?

A: I went through drug training in the Petersburg Police Academy. We were shown a number of pictures of cocaine and other drugs packaged for transport and sale. Based on that training and experience, as well as the fact that Lieutenant Vann had told me the occupants of the warehouse were suspected of trafficking cocaine, I had probable cause to believe this was a large amount of cocaine that was going to be distributed on the streets of Stetson. To confirm what I already knew to be true, and the fact that I wasn't going to just leave this second unknown person alone in the warehouse with a massive amount of drugs that they could then destroy or hide before the DEA had time to secure a warrant, as I walked by I pulled the tarp back to seize the package I had already seen. At that point, I clearly observed three very large packages of what I later learned tested positive for cocaine, and weighed a total of 31 pounds!

Q: What did you do with the packages when you saw them?

A: Well, as Lawton was wheeled out of the warehouse on a gurney by the EMT's, Vann radioed to me that Vann was outside the warehouse. So, I seized each package and handed them over to Vann and the DEA team for testing and weighing.

Q: Did you photograph the drugs where you found them?



A: No, they were photographed after I seized them. Although not ideal, I wasn't going to leave that second person alone in the warehouse with the drugs while I went outside to get a camera.

Q: Were you wearing gloves when you picked up the packages?

A: No. But again, I couldn't have left the drugs along with this second person while I went outside to get gloves.

Q: I'm showing you Exhibits 7 and 8 again. Can you circle with this red pen where you saw the three by four inches of white powdery substance wrapped in saran wrap?

A: Sure. Right here from this angle on Exhibit 7, and right here from the other angle, which is on Exhibit 8. It was visible from the moment I walked closer to it as I was leaving the warehouse, which makes sense why the other person that was there with Lawton kept looking at it. It was right there for law enforcement to see!

Q: Great, thanks. We'll mark where you made those red circles as Exhibit 7c and 8a. I'm now showing you Exhibit 10. Do you recognize it?

A: Yes. Those are the three packages of cocaine that I seized from the warehouse while I was investigating Lawton's DUI. The DEA photographed them after I had seized them.

Q: As this was all going on, what happened to the other person who was in the warehouse?

A: That idiot tried to make a run for it, but the DEA had the entire place surrounded and they were arrested.

Q: Let's go back to Jamie Lawton. Did you see Lawton again after

transport to the hospital?

A: Yes, I went to the hospital to continue the DUI investigation and have Lawton submit to a urine.

Q: Was Lawton able to submit?

A: No, when I got there Nurse Connie Passwaters informed me that Lawton had been diagnosed with appendicitis and said Lawton would need an appendectomy.

Q: So you never asked Lawton to submit to a urine?

A: No, I did. While Lawton was waiting for surgery, I asked Lawton for a urine for the DUI investigation.

Q: Wait, was Lawton under arrest at this point?

A: No.

Q: Did you tell Lawton that?

A: Yes, I told Lawton that Lawton was not under arrest, but that I was investigating a DUI. I asked Lawton to voluntarily give a urine sample, but also said Lawton had the right to refuse. Lawton said "no" because of the pain. But then Lawton followed up with, "I'm not refusing because I'm drunk. I just can't pee right now. Can't you do a blood test?"

Q: What did you say?

A: I told Lawton we could do that but first I specifically asked if Lawton was voluntarily offering to give a blood sample. Lawton affirmed with a verbal "yes, I am. I'm not drunk and this will prove it." I then had Lawton sign the blood draw consent form.

Q: Showing you Exhibit 18. This consent?

A: Yes.

Q: Based on your observations, was Lawton conscious and coherent at this point?

A: Yes, Lawton was speaking clearly and appeared alert and oriented to time and place. I actually asked the nurse if Lawton was under the influence of any pain killers at this point and she said that pain killers had not been administered yet. I asked, "What about in the ambulance?" The nurse replied, "Well EMT's brought him in and EMT's can't administer injectable narcotics, only paramedics can do that, so no, Lawton hasn't been given anything."

Q: Did you administer the blood draw?

A: No, I didn't.

Q: Who administered the blood draw?

A: Nurse Passwaters did it at about 17:45 and it came back with a blood alcohol content of .04.

Q: Based on that, what did you do?

A: Well, I knew I had PC for the DUI and cocaine, but Lawton had to go in for an emergency appendectomy, so all I could do was put a police hold on Lawton.

Q: What does that do?

A: Basically, it tells the hospital that the patient is going into custody upon discharge.

Q: There is one more thing we need to talk about Officer. Showing you Exhibit 15. What is this?

A: This thing is going to haunt me my entire career, isn't it?

Look, I screwed up and made a mistake when I input my overtime sheet back in August 2022. I worked 80 hours of overtime, but I mistakenly put in 180 hours, and I was paid for 180 hours. Internal Affairs caught the mistake before I did. I was just working so hard that I hadn't even looked at my bank account or I would have seen the overpayment and returned the money immediately. Internal Affairs said they couldn't prove intentional fraud but made a finding that I made a material misstatement on my overtime sheet and that finding will stay in my PPD personnel file forever. Look, I made a mistake, but it doesn't define my otherwise great police work.

Q: No further questions.

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I, TAYLOR GRIFFIN, have read the foregoing transcript and hereby affix my signature that same is true, correct, and accurate, and that all information I have regarding this case has been provided in this transcription and that nothing has been left out.

Taylor Griffin

TAYLOR GRIFFIN

Date: July 6, 2023



## Petersburg Police Department

*Petersburg, Stetson*

POLICE REPORT #222500612

Report Entered: 06/08/2023 21:12:43

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Date/Time Reported: 06/08/2023 16:00      Location: 900 49<sup>th</sup> St. Petersburg, Stetson

Incident Type/Offense: 1) Driving Under the Influence; 2) Possession of Cocaine with Intent to Distribute

Reporting Officer: Taylor Griffin

Approving Officer: Faith Peyton

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### Offenders

Status	Name	Sex	Race	Age	DOB	Address
DEFENDANT	LAWTON, JAMIE	M	WHITE	26	11/15/1997	900 49 <sup>th</sup> St.

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### Vehicles

Make	Model	Year	Color	License Plate
CHEVROLET	S10	2012	RED	None on back 2DFTPKNK (front only)

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### Narrative

The undersigned is a Traffic Enforcement Officer for the Petersburg Police Department. On June 8, 2023, around 16:00, I was on DUI Patrol traveling southbound on 49<sup>th</sup> Street in my marked patrol cruiser when I saw a red Chevrolet S10 pickup truck stopped at a red light at the intersection of Raymond Blvd and 49<sup>th</sup> Street. I recognized the pickup as belonging to Kevin James because of a rather crude bumper sticker he has on the back of the truck.

I had arrested James back in December of 2021 for Driving Under the Influence (DUI). As a first offender, James attempted to complete a diversionary program that

included one year of supervision, alcohol treatment, and sobriety that could have resulted in a dismissal of the charges, but James ultimately failed the program because he couldn't stay sober. As the arresting officer, the Court notified me of James' unsuccessful completion of the program and told me I had the right to speak at his plea and sentencing hearing. I attended the plea and sentencing on December 1, 2022, at which time James pled guilty to DUI, First Offense, under Stetson General Statutes § 14-227a, and received 18 months of probation and his driver's license was suspended for 9 months.

Based on my prior interactions with James, I know he lives on the other side of Petersburg, so I questioned what he was doing on this side of town on June 8<sup>th</sup>. While at the stoplight of 49<sup>th</sup> and Raymond, the driver's door opened and I witnessed a person with blonde hair tied back in a bun lean out of the truck and spit or vomit a small amount of liquid onto the road. There was no license plate on the back of the truck, but I'd recognize that truck anywhere because of that bumper sticker. Plus, the driver resembled James in build, even though at the time I could not say with 100% certainty whether or not it was James without getting a closer look. The last time I had seen James he had shaggy brown hair, but it could have grown out to the point he needed to pull it back, and he could have dyed it, especially if he was going to be driving around town on a suspended license because of his DUI conviction, an offense that carries a mandatory 30 days in jail as punishment. The traffic light turned green, and the driver shut the door and accelerated at a slow rate of speed.

Because I was still trying to figure out if this was James, I followed the driver for approximately three miles during which time the driver drifted into the emergency lane twice and was unable to keep a consistent speed. The speed limit on 49<sup>th</sup> Street is 55 mph but the driver drove between 40-45 mph, a roughly 5 mph variation that I noticed on my calibrated speedometer. After the second time the driver drifted slightly into the emergency lane, I turned on my lights to initiate a stop for a suspected second DUI within two years. The subject did not stop, but rather continued to drive for three miles. During that time the driver did not drive erratically or evasively, but did increase the speed of the vehicle by

about 5 mph. I tracked the driver for three miles on a calibrated speedometer at 50 mph. After driving those three miles, the driver pulled into a warehouse lot, parked, and walked quickly into the building. At no point did I observe the driver look back at me. Although the building appeared to be abandoned, I did notice that the driver used a key to unlock the door he entered. I also saw a sign on that door that said, "PRIVATE PROPERTY: NO TRESSPASSING."

I radioed for backup because I intended to pursue the subject on foot into the warehouse. As I was communicating with dispatch over the radio, Lieutenant Samy Vann from the Narcotics Division called my cell phone. I answered and Vann told me not to enter because the warehouse was under surveillance by a special joint state and federal task force investigating narcotics trafficking. Vann said, "There is at least one person purporting to live in the building, but we are pretty sure they are using it as a stash house. We've been building a case against the suspect for months – don't blow this for us, Griffin!"

While I understand the need to keep drugs off the street, drunk driving is incredibly dangerous and poses an unjustified and unnecessary risk to the lives of innocent drivers in Petersburg. I knew James' history of alcohol abuse and if he was so drunk that he was throwing up outside of the car while driving, I knew his Blood Alcohol Content (BAC) would likely be over the legal limit. However, I also know from my training and experience that his BAC would start to drop the longer he wasn't drinking. I know BAC's must be obtained within two hours of operation in order to be admissible in a DUI prosecution in the State of Stetson, so I knew this evidence would disappear the longer I waited. Further, knowing James was under surveillance for potential narcotics distribution, I was worried he would start to destroy drug evidence since he obviously knew I was following him with my lights on. Finally, given that this was a large building with many potential egress points, I was also concerned the suspect could escape apprehension. For these reasons, I decided to pursue the suspect I believed to be Kevin James on foot into the warehouse to initiate investigation.

Upon entering the warehouse, the subject, who I quickly realized was not Kevin James and whom I later came to know was Jamie Lawton, claimed to not notice the lights on my cruiser due to illness and wanted to go to the hospital. During our conversation, I observed Lawton to have bloodshot, watery eyes with dilated pupils. I asked Lawton what caused the vomiting and why not pull over and stop driving if Lawton really was so sick. Lawton was slow to answer and had to lean against the wall to stay upright. I explained to Lawton that I was officially treating this as a DUI investigation and asked Lawton to submit to Field Sobriety Exercises (FSEs). Lawton refused, claiming a severe pain in the abdomen area. Due to Lawton not looking well, I radioed for EMT's to come to 900 49<sup>th</sup> Street to checkout Lawton. While waiting, Lawton admitted to half a beer earlier in the day. There was also another person there with Lawton who claimed to be Lawton's friend. This person was incredibly rude and tried to tell me to leave, even though this person had no authority to do so as this was Lawton's property. I also noticed this person continually looking over toward a pallet on the ground while I was present. This alerted my suspicion to a potential weapon or other contraband.

When the EMTs arrived and examined Lawton, they believed Lawton was suffering from acute appendicitis and transferred Lawton to McDaniel Medical Center in Petersburg. As I was exiting the warehouse, I walked past the wooden pallet this other individual kept looking at. There was a tarp partially covering one of the pallets, underneath which was something that appeared to be a white powdery substance wrapped in saran wrap and duct tape. Upon seeing that, based on my training and experience, I had probable cause to believe it was cocaine packaged for distribution. I lifted up the tarp to seize the package and I found three large parcels covered in saran wrap and duct tape, confirming what I already knew to be true. Each was about the size of a small backpack and contained a white powdery substance. Due to my expertise and experience as a law enforcement officer, I had probable cause that these parcels were cocaine and seized them to be weighed and tested.



Lawton was transported via ambulance to McDaniel Medical Center. I arrived approximately thirty minutes after Lawton arrived. Lawton was diagnosed with acute appendicitis and needed an appendectomy – emergency surgery to remove the appendix.

While waiting for surgery, I asked Lawton to submit to a urine for the DUI investigation but Lawton claimed to be unable to urinate due to pain. However, Lawton voluntarily offered to submit to a blood draw for the purposes of documenting a blood alcohol content (BAC). I asked Nurse Connie Passwaters to administer the blood draw and she agreed. The blood draw was administered at 17:45 pm and later lab testing confirmed a BAC of .04.

Given Lawton's vomiting on the ground while driving, erratic driving pattern, as well as the drugs found in the warehouse, I intend to arrest Lawton for a first-time DUI and Possession of Cocaine with Intent to Distribute once medically cleared.

Officer Name: Taylor Griffin

Officer Signature: *Taylor Griffin*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

vs.

JAMIE LAWTON

CRIMINAL NO: 2023-CR-812

VIOLATIONS:

21 U.S.C. § 841(a)(1), (b)(1)(A)  
(Possession with intent to distribute 5  
kilograms or more of cocaine – 1 count)

21 U.S.C. § 846, 841(a)(1), (b)(1)(A)  
(Conspiracy to distribute 5 kilograms or more  
of cocaine)

18 U.S.C. § 342(b) (Operation of a motor  
vehicle while under the influence of alcohol  
and/or drugs by a person who holds a  
federally issued common carrier license)

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**TRANSCRIPT OF GRAND JURY PROCEEDING**

July 6, 2023

SAMY VANN, having been first duly sworn, testified as follows:

By Assistant United States Attorney:

Q: Good afternoon. Please state and spell your name for the record?

A: Samy Vann - S A M Y V A N N

Q: What do you do for a living?

A: I am a Lieutenant in the Narcotics Unit of the Petersburg Police Department. I am also a deputized agent for the Drug Enforcement Agency, or DEA.

Q: What does that mean?

A: It means I am not only a local police officer, but I am also a sworn federal agent and can make federal arrests and work on federal cases. Effectively, I am both a DEA Agent and a Lieutenant in the Petersburg Police Department.

Q: Well if you work for PPD, how often do you work with the DEA?

A: Pretty often actually, we work together to investigate large narcotics trafficking cases. We don't care so much about the smaller stuff, I let the younger and less-experienced officers in my unit handle those "buy-and-busts." Small potatoes. Sergeant Ortega oversees those cases. But Ortega of course reports to me and keeps me informed of what is going on, but I mostly work large trafficking cases with the DEA.

Q: Why is that?

A: Well, Stetson is a big state, and we have oceans on either side of us - the Atlantic and the Gulf. Drugs are smuggled into Stetson from all sides, and we have to do our part to try to keep those dangerous narcotics off the street.

Q: Let's talk about Jamie Lawton. Do you know who that is?

A: Yes. Jamie Lawton was a target of a long-term DEA narcotics trafficking investigation.

Q: How did Lawton first get on your radar?

A: Well, we are constantly monitoring points of entry into the State of Stetson - mostly the airports, shipping ports, and railroad stations. We also monitor commercial methods of potential transportation -- like the post offices, trucking routes, and

railroads. I have a contact within the West Stetson Railway Company, which runs not only from Napoli, Stetson and up through Petersburg, but then goes all the way through Stetson's neighboring states. The railroad is a large distributor of manufactured products to the Southeastern United States. A vital cog in our interstate commerce if you will. Anyway, this contact is not a police officer, but rather is what's known as a Confidential Informant. Known in the law enforcement world as a CI. The CI is employed by the railway, but lets me know when someone or something looks suspicious. About three months ago, the CI told me I should look into Jamie Lawton. The CI said Lawton was moving large packages onto the train during off hours - either before or after official loading and unloading.

Q: Did you?

A: Yes. I did an NCIC criminal record check, ran a DMV history, and a property records check. Turns out Lawton was employed by the West Stetson Railway Company as a train conductor and had a federally issued common carrier license. We set up surveillance on Lawton and sure enough what the CI said was accurate. Over the course of a month there were three different times when Lawton would punch in early or clock out late and meet a truck on the side of the railyard and load large duffle bags into the side of the train. We figured they were moving narcotics, but wanted to see where it would lead us. We trailed Lawton for about two months. We wanted to find out who Lawton's contacts were and where these packages were going.

Q: Did you?

A: Yes. We tracked Lawton to a property that Lawton owned in Petersburg. It was located at 900 49<sup>th</sup> Street, Petersburg, Stetson.

It was an old, abandoned warehouse that we believed Lawton was pretending was Lawton's residence, but we couldn't prove that for sure. He did appear to spend most nights at the warehouse, so we were building a case that was strong enough to get a search warrant.

Q: What do you mean?

A: I've been a narcotics officer for 18 years. I've seen it all. Law enforcement doesn't need a warrant to search an abandoned property because no one's privacy rights are at stake. But drug traffickers also can't just move large quantities of narcotics out of their neighborhood houses or apartments because neighbors call the cops, or people could get wind of it and try to rip them off. So, the smart ones like Lawton try to strike a balance. They use abandoned properties to move the drugs, but put up "no trespassing" signs to try to feign a privacy interest in the location. They also will create make-shift homes to make it seem like they are actually living there, and that makes it tougher for law enforcement to get a search warrant because, rightfully so, the Fourth Amendment treats one's home as their castle. So, if the drug dealer is smart and doesn't sell the drugs directly out of the property and they can establish some semblance of a residence, it makes it difficult for us to get a search warrant. Don't get me wrong, we always get the warrant eventually, it just sometimes takes us a little longer to get there. For example, we usually need to build a CI or UC (under cover) relationship with the suspects in order to get inside the building to be able to confirm there are actually drugs inside, and that takes time. Anyway, this sham residence situation is totally what was happening here. I've seen the pictures of what Lawton claims is a residence in this case. And come on, look at the place, no one was actually living

there. It was uninhabitable. This was a sham residence to try to keep law enforcement at bay.

Q: So let's talk about June 8, 2023. What happened that night?

A: Taylor Griffin got cocky is what happened. That rookie disregarded my orders and went inside the warehouse. I understand Griffin was pursuing a suspected DUI, but Griffin blew up our case way too early. Yeah, we got 31 pounds of cocaine off the street, but we wanted more. We wanted the suppliers, and now it's gonna be tough.

Q: So walk us through it. How did everything go down that night?

A: Griffin radioed in pursuit of a suspected DUI driver into an abandoned building at 900 49<sup>th</sup> and asked for back-up. I called Griffin's cell phone because criminals will often monitor police radios and I didn't want anyone out there to know about our surveillance operation. When Griffin answered I said don't go in because 900 49<sup>th</sup> is a DEA target and there are surveillance officers in the area. Griffin said, "Well then that means a guy named Kevin James is your target and I got him for you!" I have never heard of Kevin James, so I said, "There is no Kevin James connected to the warehouse or our case! Leave it alone, Griffin! There is likely a large amount of cocaine in the building, and we need to track where it goes from here!"

Q: What did you mean by "track where it goes?"

A: We were trying to figure out if they were cutting and packaging in the warehouse, or if they were just "middle-guys" and moving the drugs elsewhere from the warehouse. Basically, was it just a stash house, or was this where the actual packaging and distribution operation was happening. We had reasonable suspicion

it was just a stash house because we had not seen a lot of foot-traffic (buyers) in and out of the building, but were waiting to make sure. And we were trying to track where the drugs were going from there. This is how you do a long-term investigation and take down cartel-level trafficking. Patience is key. But of course, Griffin couldn't be patient.

Q: So what happened?

A: Griffin disregarded my orders and went in.

Q: What did you do at that point?

A: I drove into the parking lot outside the warehouse and waited outside the door while Griffin was inside.

Q: You mentioned earlier that Lawton owned the building, did Lawton own the parking lot too?

A: Actually, no. Lawton must have been short on cash when Lawton bought the building, because the land deed actually severed the property. Lawton owns the building, but the city of Petersburg still owns the parking lot.

Q: Showing you Exhibit 16. Is this the property deed you are referring to?

A: Yes, you can see here how the property was severed at sale. Of course, that didn't stop Lawton from trying to claim the parking lot as part of the property.

Q: What do you mean?

A: Lawton slapped up some "no trespassing" signs on the fence outside the parking lot in an attempt to keep people out, but they are meaningless.

Q: Showing you Exhibit 12. Is this one of the signs you are talking about?

A: Yes. Lawton put up a bunch. Waste of time.

Q: OK, so you pull into the parking lot after Griffin goes in. What happens next?

A: Griffin is in there about 20 minutes.

Q: Did you actually see Griffin enter the building?

A: Yes, I was pulling into the parking lot as Griffin entered because I was around the corner when Griffin radioed for back up. I saw someone walk into the building, and then I saw Griffin go in behind them.

Q: Walk?

A: Yeah, but it was a like a fast walk. The person was definitely moving with purpose, but it didn't look like they were necessarily sprinting away from Griffin. More just like had somewhere to be. They had to stop to unlock the door, and I could see that kind of hurried shifting movement in their body as they were trying to open the door, like "come on, come on..."

Q: Showing you Exhibit 4. What door did the person enter?

A: This large one on the left with the metal doors.

Q: Did the person close the door behind them after going inside?

A: I saw the door swing shut after the person went inside, and at that moment I heard a loud bang. But the bang didn't sound like the door fully closed. The bang sounded more like the door bounced hard off the door frame and didn't latch closed properly. I don't



know whether the person intentionally tried to close the door behind them, or if they just went in so fast they didn't notice it hadn't fully shut behind them. I could see that the door was still slightly ajar, maybe still open a foot, after the person entered, but it wasn't fully open or swinging in the wind. I saw Griffin approach, push the door all the way open, and go inside.

Q: What happened next?

A: I stood outside and waited for about 15-20 minutes. Then an ambulance showed up. EMT's brought Lawton out on a gurney shortly after that and took Lawton to the hospital.

Q: While you were waiting outside, what were you doing?

A: I was just waiting outside in the parking lot area. On high alert worried that something might go down, but I couldn't go in. This was now Griffin's show because Griffin was the one pursuing the DUI.

Q: Where were you located exactly?

A: Well, looking at that picture of the outside of the building, Exhibit 4, right over here by the greenish-colored door.

Q: Could you see into the building at all?

A: Not initially.

Q: Did there come a point when you could?

A: Yeah, when the green door opened and the EMT's walked out with Lawton on a gurney, I was able to see inside. It was decently lit - lots of natural light in the late afternoon.

Q: What did you see?

A: I saw Griffin walking toward the door to head out of the building after the EMT's left and on Griffin's way out I saw Griffin look down to the left, then stop, walk to his left a few feet, and then bend over and lift up a tarp. Then heard Griffin then say, "Exactly what I thought."

Q: What happened next?

A: Griffin then picked up three large packages of what later tested positive as cocaine and walked outside and handed them to me. As that happened, I saw the second person who was inside take off running toward the back of the building. I radioed a BOLO - Be On Look Out - to my team that had surrounded the building. They grabbed the person. That person was later identified as Kell Halstead. Halstead was arrested and mirandized and later sung like a bird. Griffin brought out the three packages of cocaine, it all tested positive, and weighed a total of 31 pounds.

Q: What did Halstead say after being mirandized?

A: That Halstead wasn't the "big fish" here. That this was all cartel work and Halstead was being threatened to move the drugs. Halstead admitted to recruiting Lawton to move cocaine for the cartel using the railway system, which matches with the surveillance we had on Lawton. Kell thinks we are going to give Kell a deal for singing, but that's unlikely. Kell did not give us anything we don't already know. Does Kell honestly think that the DEA doesn't know that cartel's use the railway system to move drugs, or that drugs are cut with other substances to stretch the product to make more money? The only question is do we turn Kell into a Confidential Informant and put Kell back on the street to gather and report back more intel on this particular cartel's membership and operations within Stetson and the United States.

The problem is CI work requires trust, and I don't trust Kell. Plus, that would require us to let 31 pounds of cocaine back onto the street because obviously the cartel would know something was up if the cocaine, and the money from its sales, disappeared, but Kell didn't. That would likely put Kell's life in danger, which we don't want to do. It's complicated. We'll see down the road if there is any type of deal to be had. But bottom line, Kell and Lawton are drug traffickers because they were in possession of 31 pounds of cocaine! That's no dime-bag for personal use.

Q: Did you have any other involvement in the case?

A: Yes, after Griffin discovered the cocaine in plain sight, I applied for an emergency search warrant for the premises, which was granted, and we executed it less than an hour after all of this went down. We were looking for any other narcotics, weapons, cash, and packaging materials, but we didn't find any. All we found were some chicken wings, cheese, and a jar of pickles in the fridge; a bowl of Spaghetti-Os on the small table next to the stove; a bottle of Peppermint Schnapps in a small cabinet next to the stove (Exhibit 13), and a make-shift bedroom on the second floor (Exhibit 14). This warehouse was definitely just a stash house where the drugs were kept before being moved to a separate location for cutting, packaging, and distribution. Wish we could have followed the drugs and conducted surveillance for longer, but I guess DUI's are crimes too.

Q: No further questions.

(Proceedings Adjourned.)

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I, SAMY VANN, have read the foregoing transcript and hereby affix my signature that same is true, correct, and accurate, and that

all information I have regarding this case has been provided in this transcription and that nothing has been left out.

*Samy Vann*

SAMY VANN

Date: July 6, 2023

## **SWORN STATEMENT OF JAMIE LAWTON**

1. My name is Jamie Lawton. I'm 25 years old.
2. I work as a railroad conductor for West Coast Stetson Railway. I've been there for about five years now.
3. I've also been working a second job as a bartender to pay for renovations to my new place.
4. I live at 900 49<sup>th</sup> Street in Petersburg, Stetson. It's an old warehouse that I got when it went into foreclosure. I've been there for about three months, but it is in bad shape. Some of the windows are missing, it needs new insulation, and the paint is peeling.
5. Exhibits 4, 5, 6, 7, 8, 9, 13, and 14 are my warehouse and pictures of the inside, including my current bedroom on the second floor. The rest of the place isn't yet habitable, but I am going to fix it up. I've seen these guys on YouTube who convert old warehouses into living spaces and businesses. It's awesome and I aspired to do it with this place.
6. I want to eventually set up a storage facility in the warehouse where people can rent units. And I'll live in one section of the warehouse, and then rent out all the units and manage the place on site. The railroad business requires a lot of travel, and I don't want to do it forever. My friend Kell, who works with me at the bar, is going to help me fix the place up. Kell wants me to build an extra bedroom so Kell can live there too, and so that we can go into business together. This was kind of my personal dream to do on my own though, so we'll see. But for now, Kell is there a lot and stores a lot of stuff there. Kell doesn't live with me though.
7. Right now, the warehouse is still filled with a lot of old junk from the prior owners and some squatters I kicked out when I bought the place. Yes, I live there. I'm not proud of it, but it is my home.

8. I haven't had a chance to clean up the warehouse or go through all the junk in there because I've hardly spent much time in the warehouse. I just work so much – days, nights, weekends.
9. On June 8, 2023, I was at Right on Cue: Pool House & Casino with my friends Kierstyn and Matt from about 1:00 to 3:45pm. We go there a lot to play pool and blackjack on our days off even though I'm trash at it. Kierstyn isn't too good either though, so at least misery has company.
10. While we were at Right on Cue, I only had half-a-beer because I wasn't feeling well, and I bought Matt and Kierstyn some drinks.
11. Exhibit 19 is my receipt from Right on Cue. One of the beers was mine, the rest of the beers and shots were for Matt and Kierstyn. We also had some jalapeño poppers, which turned out to be a terrible idea.
12. I left sometime around 3:45 or 4:00pm to head back home.
13. I was driving my cousin Kevin's truck. The whole time I was driving it was making clunking noises that sounded like the engine was going to give out. Not sure what was going on with it.
14. About five minutes into my drive, I really started to feel awful. I got this sharp pain in my stomach. I figured it was from the jalapeño poppers because my stomach doesn't always do great with spice.
15. I came up to the light at the intersection of 49<sup>th</sup> and Raymond Blvd. Thank goodness, the light was red because right when I stopped, I had this sour burp where I threw up a little in my mouth. It was disgusting. I couldn't find a cup or anything in Kevin's truck, so I opened the driver's door to spit it out. It didn't help to get the taste out of my mouth though,

it was vile. I wasn't heaving or throwing up violently though, just spitting out the small amount of vomit that was in my mouth from that burp.

16. All of a sudden, the pain worsened on the right side of my stomach so much that it nearly took my breath away. I couldn't tell if I was going to throw up or pass out. All I wanted to do was get home, but I was afraid if I drove too fast that Kevin's truck would break down. I was basically hunched over the steering wheel the entire time just praying I'd get home as soon as possible and that the pain would subside. I could barely move at all. I basically gripped the steering wheel as hard as I could and drove straight ahead to my warehouse. I was not tapping my brakes at all while driving. I was basically going as fast as I could without the truck breaking down.

17. The pain was so bad that as soon as I got back to the warehouse, I walked inside, but it was a really painful walk. Each step shot pain through my entire abdomen. I contemplated using a cell phone to call an ambulance right then and there, but held off. Didn't really want to call attention to myself or my property. I'm pretty embarrassed about how I am living right now.

18. When I got inside the warehouse, the first thing I did was go to the kitchen area and open a bottle of Peppermint Schnapps to try to wash the vomit taste out of my mouth. I drank a few mouthfuls, but I could still taste it, so I took a few more. I figured, if anything, it may numb some of the pain.

19. The pain continued to get worse, and I was doubled over. I thought I was going to puke. It was awful. Kell was there and told me to get it together because we had to work that night and we needed the cash.

20. All of a sudden, some cop came into the warehouse. I now know the cop's name is Officer Griffin. I had probably been inside for at least a minute before Griffin came in. I don't even know how Griffin got inside because I closed and locked the door behind me when I walked inside. I always do. There is a deadbolt on the inside that I always lock. But I guess maybe I didn't slide it tight enough because I was in so much pain. Either way though, it's definitely not like I invited Griffin inside. Griffin never should have entered my home without my permission or a warrant. These rogue cops think they are above the law. Makes me furious. Kell was yelling at Griffin to get out. I even told Griffin to leave and that I was going to call an ambulance for myself. But of course, Griffin didn't listen.
21. Officer Griffin asked me why I didn't stop when Griffin had turned the cruiser lights on and tried to pull me over. I told Griffin I was sorry, but I hadn't noticed a police car behind me because I was too focused on getting home. I explained that I was really sick and needed to go to the hospital.
22. Officer Griffin asked me what was wrong, and I explained that I had this sharp, excruciating pain in my stomach. Officer Griffin called for an ambulance to come.
23. While waiting for the ambulance Officer Griffin told me Griffin was investigating me for driving under the influence. I was honest and said I was at Right on Cue down by Bishop Square and had half a beer, but it was hours ago. I didn't think to mention the Peppermint Schnapps because I drank it after I drove.
24. A few minutes later the EMTs arrived and checked me out. When they pressed on my stomach, I nearly passed out it was so painful. The EMT told me he believed the problem was my appendix and that I had to go to McDaniel Medical Center immediately.



25. When I got to the hospital everything was a blur because I was in so much pain, but I do remember the nurse telling me I needed to have surgery to remove my appendix.
26. While I was waiting for surgery, Officer Griffin showed up in my hospital room to tell me I needed to pee in a cup for the DUI investigation.
27. I didn't mind peeing because I knew I wasn't drunk, but I was in so much pain that I was afraid I wouldn't be able to, so I offered to have my blood drawn instead. I signed the consent form, and the nurse drew my blood.
28. Exhibit 18, yeah, that's the consent form I signed.
29. After my surgery, I was arrested for Conspiracy and Possession of Cocaine with Intent to Distribute, as well as Driving Under the Influence. I'm remanded in jail as these charges are pending in federal court.
30. I had no idea there were drugs in the warehouse and I have never sold drugs in my life. I've never touched any packages like that. Kell stores all kinds of stuff in my place. I don't ask questions. Kell's business is Kell's business.
31. I was not impaired by alcohol while driving. If anything, I was impaired because of my appendicitis.
32. I, JAMIE LAWTON, have read the foregoing and hereby affix my signature that the above is true and accurate; contains all of the information I know regarding this case; and nothing has been left out.

*Jamie Lawton*

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Jamie Lawton

Date: July 20, 2023

## **SWORN STATEMENT OF KELL HALSTEAD**

1. My name is Kell Halstead. I am 34 years old.
2. I am well aware of my rights, particularly my right to remain silent. This isn't my first rodeo. Been in and out of the system for years. I've been fully mirandized by the cops, and despite my lawyer's best advice, I've waived my right to remain silent. I'm hoping the government will appreciate all of the awesome information I am about to give them and offer me a deal to either become a CI, or put me in witness protection. Let's do this.
3. Really, I'm the victim here. I've been hustling pool halls and playing cards in backrooms for years and a few years back at this place called "Chicken & Pool" in Beechum County, I hustled this guy named J.T. and it went really bad. I won, but he was furious. Turns out he was connected with a drug cartel that ran cocaine through this place called the Sac O'Suds. Talk about messing with the wrong guy. I tried to play it off and told him he didn't owe me any money, but it didn't work. Actually, the opposite. J.T. said he would kill me if I didn't help run drugs for the Cartel.
4. So, I did. The Cartel has a major supply chain pipeline through Stetson. They smuggle the cocaine in through various ports – the entire state is basically surrounded by water after all – and then they use the railroad system to move them throughout the state and to different areas of the country. Everyone has their eye on the sky after 9-11, so we exploit the failing railway systems. Brilliant really.
5. I recruited Jamie Lawton about six months ago, the turn of the new year to be exact. Jamie was hesitant at first, but liked the cash. I didn't tell Jamie explicitly who I worked for or what I was doing, but that I needed some packages moved "off the books." I paid Jamie \$1,000 a week to keep some empty space on the trains and to load and unload my packages

whenever I asked. One night Jamie was lifting one of the packages at the Petersburg port and said, “So Kell, what is this stuff? Frank Lucas product or Pablo Escobar product?” I knew exactly what Jamie meant – Frank Lucas was a notorious gangster who smuggled heroin into the United States on American service planes returning from the Vietnam War. There’s a movie about it called “American Gangster.” Great flick. Anyway, and obviously Pablo Escobar was a Columbian drug lord known as the “King of Cocaine” who ran the Medellin Cartel. I looked right at Jamie and said, “Pablo Escobar on steroids!” Jamie laughed and said, “Woah, I was just kidding!” I kind of pretended to laugh like I was joking and then said, “Well, don’t ask questions you don’t want the answer to.” Then there was this kind of awkward silence and Jamie and I just looked at each other and we didn’t say anything else. I think Jamie was too shocked to speak and regretted asking.

6. We worked together for about six months, but never again talked about what I was doing. Jamie just moved the packages on and off the train for me and didn’t ask questions about what was in them. About four months ago Jamie bought an abandoned warehouse in Petersburg. Jamie sent me this YouTube video, Exhibit 17, about a guy who bought an old abandoned warehouse and fixed it up. Jamie was so excited to do the same thing. Jamie wanted to make the warehouse a storage facility, and live in a small portion of it. Jamie was so excited about this project that Jamie was even living there before having the time and money to actually fix it up. Jamie really had plans for the place, and honestly, I wanted in on the project. Jamie was considering it.
7. Anyway, I would often ask Jamie if I could store things at the warehouse because I didn’t think it would look suspicious for packages to be going in and out of a warehouse. Jamie would let me store my packages there and didn’t ask questions. I would keep my packages

with the cocaine at the warehouse before moving them to a different location in the city where the cocaine would be cut and packaged for street sale. “Cut” means mixing the product with a cutting agent – like sugar, creatine, mannitol, or even powdered laxatives and powdered laundry detergent – to stretch the product as far as possible and make the biggest profit as possible. Cutting and distributing wasn’t my job though, I just moved the stuff.

8. I had a great thing going on until Jamie had to go and drag the cops literally through the front door. Idiot. If Jamie had just pulled over, this never would have happened. Who doesn’t pull over for the cops? You pull over and act cool. Worst case you get popped for a DUI and spend a night in jail, but so what?! I had way bigger fish to fry with my operation and Jamie blew it.
9. That said, I’m here to tell the truth because I want a deal from Lieutenant Vann – everyone in the drug world knows Vann is the officer you want on your case because Vann turns arrestees into CI’s. Stay out of prison, snitch on the bad guys, and make some extra cash! It’s a life I want, and I want to build trust with Vann. And obviously the Cartel is going to be pissed that the Feds seized 31 pounds of their coke. The Cartel has people on the inside, so I’m not safe in prison. But if I can get out and spin the story that the coke got stolen off the train car by a rival cartel, I might be OK.
10. So, I’m being honest here. My lawyer tells me Vann didn’t want Griffin going inside and that makes total sense because if Vann knew the DEA had a right to be in our warehouse, I know Vann would have been first through the door. I hear from my lawyer that Vann actually told Griffin not to go in, and was Vann right. From the moment I saw Griffin, it was obvious Griffin was on a mission.

11. I heard Jamie come inside that night. I heard the door slam shut behind Jamie. It did not swing or bounce around. It was closed. I heard it bang and shut once and only once because that metal door is so damn heavy and loud when it closes. Now maybe Jamie didn't fully lock it because Jamie was obviously sick and in pain that night, but the door was shut!
12. So, Jamie and I are talking in the kitchen when all of a sudden Griffin comes around the corner. Griffin looked like a little kid who was trying to show off on the playground. In way over their head. You could tell Griffin was trying to look tough – puffing their chest out and strutting – but you could also tell Griffin was nervous. Talking fast, hands a little shaky, and sweat on the brow. Griffin then points at Jamie and says that not only is Lawton a “drunk driver,” but that Griffin also knows Lawton is a “drug dealer.” I remember Griffin using the term “drug dealer” because I thought to myself, “Well, actually, no one here deals anything, so joke’s on you kid.” Griffin then said, “This is why you should only break one law at a time – the chance of getting caught is lower. But you couldn’t help yourself from driving drunk, so now you are going down for two serious crimes. Give me your license.”
13. At this point I could tell that Jamie was really sick and I was pissed off, so I told Griffin to leave. Of course, Griffin didn’t. Moments before Jamie came home, I had been moving some packages to get them ready to transport that night. I had to deliver it to the distributors. The packages were over on a pallet by a shelf and covered by a tarp. I always hide the product among other objects and cover it up so that if anyone happens to stumble into the warehouse it just looks like trash, and no one will bother with it.
14. I don’t remember looking over at where the cocaine was, but I guess it’s possible because I was worried that if Griffin found it, we were screwed. I can tell you for sure though that

I covered it all fully with the tarp! I always do. I'm moving serious product. I never let any part of it show. But in Griffin's efforts to be Officer of the Year, Griffin went looking for it and, sure enough, Griffin found it.

15. The EMT's arrived and took Jamie out on a gurney. As Griffin was walking out, Griffin did not walk straight to the door. Rather, Griffin walked over to the left toward the wooden pallet. Like Griffin was on a mission. The door was at an angle over to the far-right side of the room we were in, but instead of walking straight in that direction, Griffin decided to take a wide arc through the area and walk over toward the left, directly to the pallet with the cocaine. Griffin had to walk at least five or six steps out of his way. Griffin then bent over and lifted up the tarp and said, "That's exactly what I thought I'd find."

16. When that happened, I took off. There is an exit at the back of the building, and I tried to get there, but the Feds had the place surrounded. I was quickly arrested and now here we are. Anyway, tell Vann I was completely honest!

*Kell Halstead*

Kell Halstead

Date: June 27, 2023

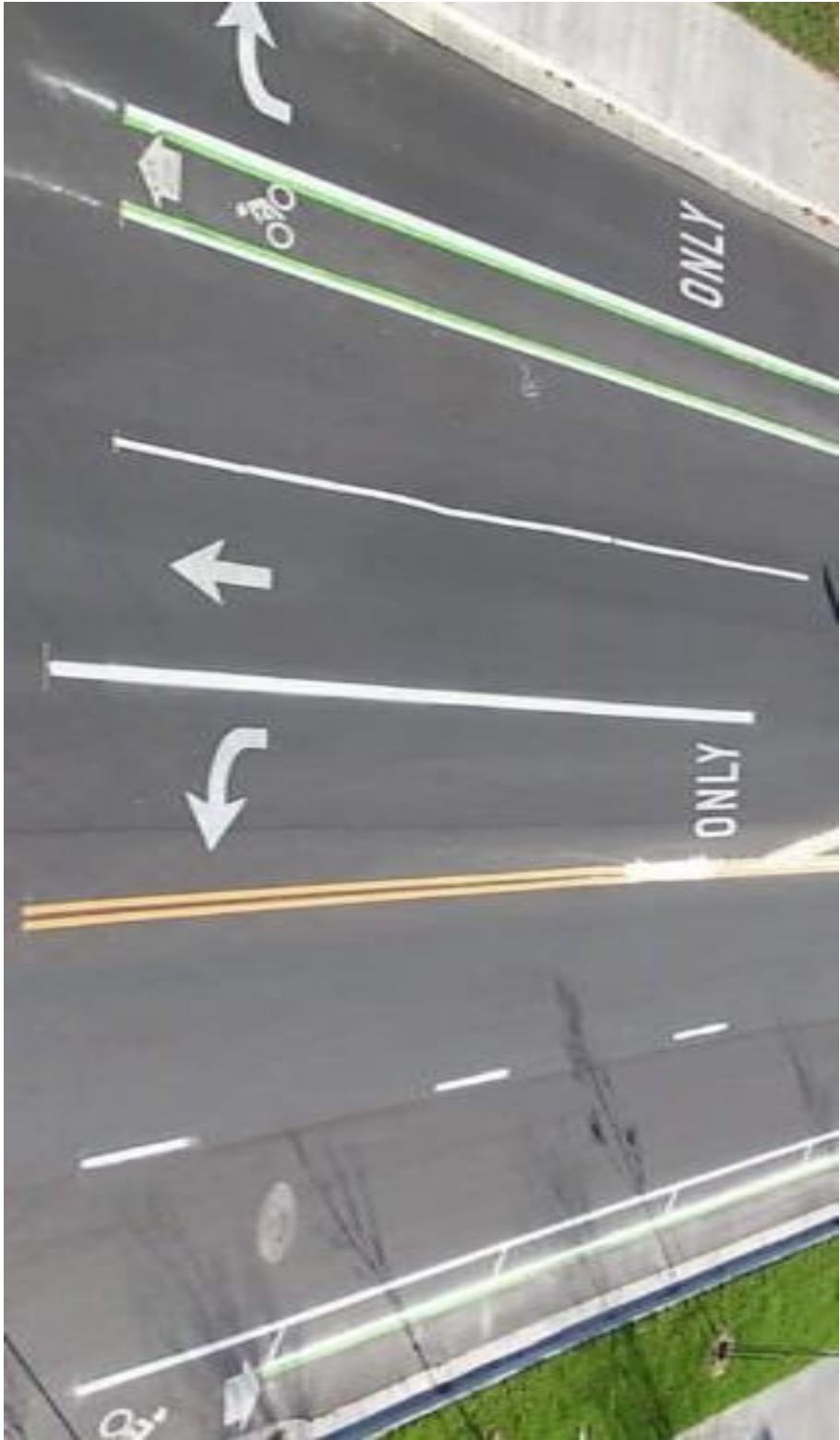


EXHIBIT 1

EXHIBIT 2







1401 61<sup>st</sup> Steet South Petersburg, Stetson 33707

Customer: Petersburg Police Department

This is to certify that on May 17, 2023, I checked the speedometer on a Ford Explorer SUV, Vin #12314569887, by means of radar and found it to read as follows:

SPEEDOMETER READING	RADAR READING
20	20
30	30
40	40
50	50
60	60
70	70

**Southwest Calibration**

**KUSTOM HR-12 Radar Gun**

Calibrated by Current Tuning Forks  
Before & After Testing

The Radar that was used to conduct the speedometer accuracy test on the above described vehicle was calibrated and found to be accurate before and after the above accuracy test by the undersigned.

Signed: *Stacey Coplington*

Date: May 17, 2023

EXHIBIT 4



EXHIBIT 5



EXHIBIT 5a



EXHIBIT 6



EXHIBIT 7



EXHIBIT 8



EXHIBIT 9





EXHIBIT 7a



EXHIBIT 7b



EXHIBIT 7c\_



EXHIBIT 8a





EXHIBIT 10

EXHIBIT 11 \_\_\_\_

**NO  
TRESPASSING**

**PRIVATE  
PROPERTY**

EXHIBIT 12



EXHIBIT 13





EXHIBIT 14



EXHIBIT 15



**Petersburg Police Department**  
*Petersburg, Stetson*  
INTERNAL AFFAIRS REPORT

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Date: 09/14/2022

Incident Type: Material Misstatement on Overtime Sheet

Investigating Officer: Jo Galloway

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In August 2022, Officer Taylor Griffin reported working a total of 180 hours of overtime for DUI patrol in the month of August. This was reported to the Internal Affairs Department by Sergeant Cameron Mueller as excessive overtime. Mueller asked that we look into it to determine either that it was accurate (and if so, to tell Griffin to take some time off) or inaccurate, in which case far more serious action would need to be taken by this office.

The undersigned reviewed all assignments and duty reports for the month of August. On the books, Officer Griffin should have only reported, and been paid for, 80 hours of overtime. Not 180. When the undersigned confronted Officer Griffin about this, Griffin remembered working an extraordinary amount of overtime in August 2022 because of the new MSDD grant and the fact that it was summertime and people were partying, and thus drinking and driving more often, but couldn't remember the exact number of hours worked. The undersigned said there was a big difference between the 80 hours documented and the 180 hours reported, and the excessive overtime payment was made as a result. Officer Griffin said there was no intention to deceive the PPD in order to make more money, and perhaps instead of hitting the "Tab" button on the keyboard when entering the overtime hours, perhaps Griffin hit the number "1" button instead, and that's how the mistake was made. Griffin apologized and asked that this not be put in Griffin's personnel file because

Griffin was hoping to get promoted soon. The undersigned said that this report being placed in Griffin's permanent personnel record is the best outcome Griffin could have hoped for, because if this was able to be proven as intentional fraud, Griffin would have been terminated and prosecuted. Griffin was very apologetic and said Griffin will be more careful in the future.

Officer Griffin was ordered to return the unearned overtime money. Griffin did so the next day. Griffin was officially found to have made a material misstatement on an overtime sheet and was placed on probation for the remainder of the year.

Officer Name: Jo Galloway

Officer Signature: *Jo Galloway*

EXHIBIT 16

**Quit Claim Deed**

This Quit Claim Deed is made this 13<sup>th</sup> day of February, 2023, by and between the City of Petersburg, Stetson, hereinafter called the Grantor, and Jamie Lawton, hereinafter called the Grantee.

WITNESSETH, that the Grantor, for and in consideration of the sum of \$150,000 and other valuable consideration, the receipt whereof is hereby acknowledged, hereby grants, bargains, and sells unto the Grantee, and Grantee's successors, heirs, and assigns forever, all that certain parcel of land, to wit:

**900 49<sup>th</sup> Street Petersburg, Stetson 33711**

TOGETHER with all the tenements and appurtenances thereto, with the exception of the attenuated parking lot. Only the building and the land on which the building sits are hereby conveyed through this Quit Claim Deed. The attenuated parking lot is not so conveyed and remains owned by the City of Petersburg.

TO HAVE AND TO HOLD, the same in fee simple forever.

The Grantor, having obtained said aforementioned property in foreclosure, makes no warranties, representations, or covenants as to any encumbrances, restrictions, or easements of record.

IN WITNESS WHEREOF



*Jamie Lawton*

Jamie Lawton

*Bryan Sorenson*

Bryan Sorenson

Clerk of the City of Petersburg

EXHIBIT 17

[I Bought an ABANDONED BUILDING...my DREAM LIVE/WORK space?? - YouTube](#)



<https://www.youtube.com/watch?v=ymFsfZy738w>

EXHIBIT 18



**Petersburg Police Department**

*Petersburg, Stetson*

Blood Draw Consent Form

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Date: 06/08/2023

Time: 17:40

I, Jamie Lawton, of sound mind and body, hereby give consent for my blood to be drawn and tested by McDaniel Memorial Hospital and understand that any incriminating results can and will be used against me in a court of law.

Signed: *Jamie Lawton*

Date: June 8, 2023

EXHIBIT 19

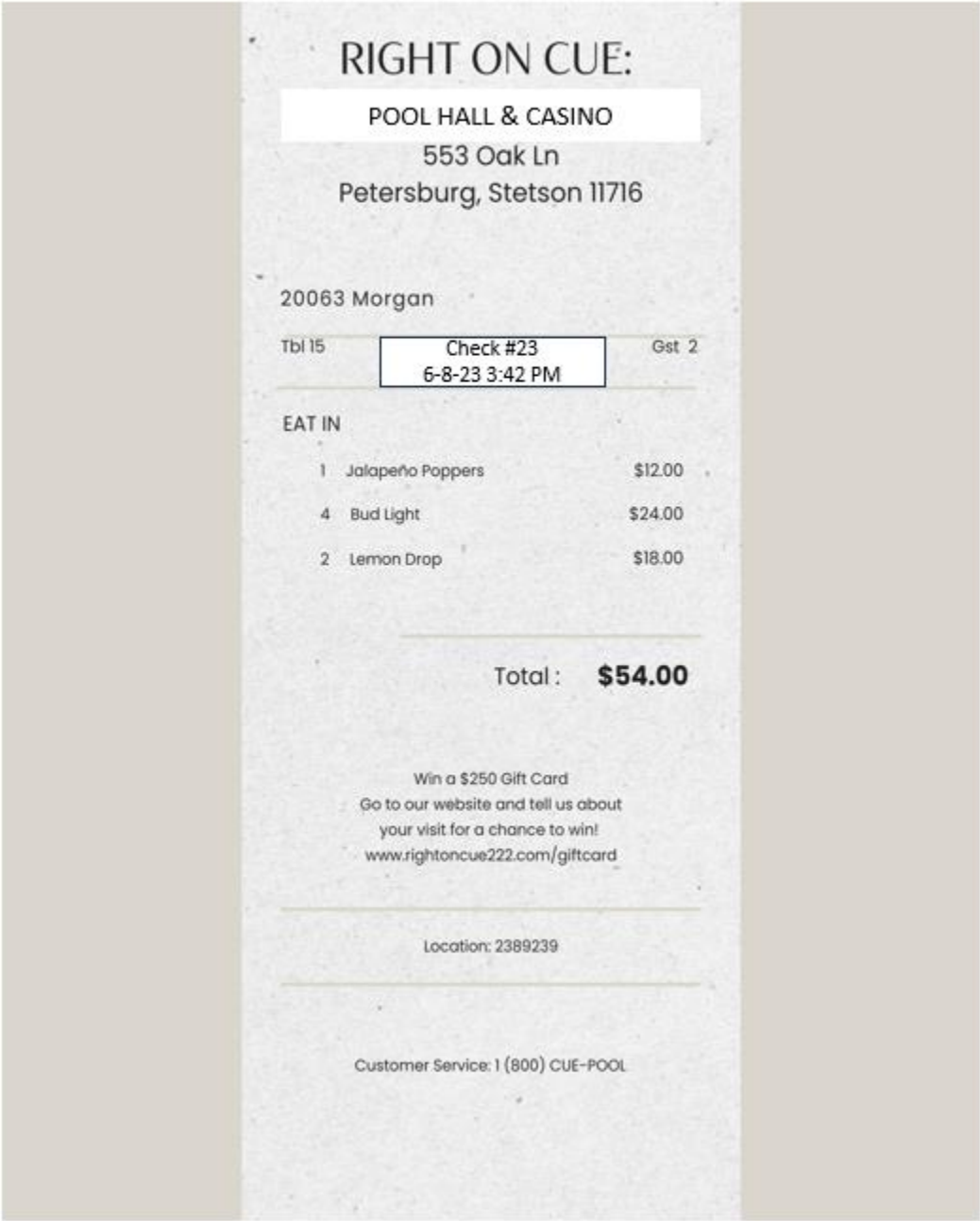


EXHIBIT 20

**Arrest and Conviction Record of Kell Halstead**

NAME/ HALLSTEAD, KELL  
DLN/F7882929  
SSN/555423176

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ARR/DET/CITE/CONV:

#1  
03-13-13 ARREST PPD CC 565 – POSSESSION OF MARIJUANA. MISDEMEANOR.  
03-21-13 RELEASED FROM CUSTODY AND CONVICTED. PLEA OF GUILTY, TIME-SERVED W/ 1 YEAR PROBATION.

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#2  
1-25-15 ARREST PPD CC 120 – ATTEMPTED BATTERY WITH A DANGEROUS INSTRUMENT, FELONY  
5-27-15 RELEASED FROM CUSTODY AND CONVICTED, PLEA OF GUILTY, TIME-SERVED, 3 YEARS PROBATION. VICTIM UNCOOPERATIVE.  
11-8-15 VIOLATION OF PROBATION. CONVICTED. PLEA OF GUILTY. 18 MONTHS PRISON. PROBATION REVOKED.

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#3  
10-12-19 ARREST PPD CC - 786 - PETTY THEFT, MISDEMEANOR  
10-15-19 CONVICTION, PLEA OF GUILTY, \$200 FINE. STAY AWAY ORDER.

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#4  
10-12-21 ARREST PPD CC - 786 - ASSAULT – THIRD DEGREE, MISDEMEANOR  
12-15-21 CONVICTION, PLEA OF GUILTY. 6 MONTHS JAIL. NO CONTACT ORDER.

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NOT TO BE DUPLICATED