



STETSON LAW

# **Nineteenth Annual National Pretrial Competition**

Stetson University College of Law  
October 1-4, 2026

## **Competition Problem**

*United States of America*

*v.*

*Emily Calloway*

Case No. 2025-CF-00417

The 2026 National Pretrial Competition Problem was drafted by Carson A. Sadro, Esq.  
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Stetson University College of Law

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## Stipulations of the Parties

1. All exhibits are accurate, authentic, and contain all information relevant to the issue before the Court.
2. All transcripts are true and accurate transcripts of what was said. Where an excerpt of a transcript has been provided, the parties agree that all information relevant to this proceeding is contained therein.
3. Exhibits 2, 10, 12, 14, and 22 are admissible at any time without objections and may be entered and read into the record by either party at any time during the proceeding.
4. For brevity, the parties agreed not to use at the hearing all of the police reports made during the investigation of Daniel Blake's death. No party may argue that such reports do not exist, were not disclosed, or contain information not stated in the case file.
5. No witness or party may claim that they do not intend to use a particular piece of testimony or exhibit contained or referenced within this case file at trial.
6. On October 10, 2024, Emily Calloway testified in the case of *United States v. Saint Donovan* pursuant to court order and received use and derivative use immunity for her testimony in compliance with 18 U.S.C. §§ 6002, 6003, the relevant portions of which are accurately reflected in Exhibit 13. The parties further agree that Defense appropriately filed this exhibit under seal prior to the hearing and Special Agent Bryce Nolan has not seen its contents.
7. It is stipulated that no agent of the Government spoke to Kennedy Parker prior to October 31, 2024.
8. Exhibit 21 accurately reflects the notes taken by Maddox Armana during their interview of Sierra Seton on February 15, 2024. The parties agree that Defense appropriately filed this exhibit under seal prior to the hearing, and the Government has not seen its contents.
9. At the hearing, Emily Calloway is constructively seated at the defense table wearing a navy dress and navy jacket.
10. Exhibit 17 correctly reflects the total number of shifts worked by the employees listed in Exhibit 17 for 2023.

## Hearing Procedures

1. The only evidence that parties may offer into evidence and the only items to which "best evidence" objections may be made are those provided in this file.
2. The Government will call Tatum Sinclair and Bryce Nolan. The Defense will call Kennedy Parker and Maddox Armana.
3. If asked, witnesses must admit that their prior testimony and reports are complete statements of everything they know relevant to this hearing. In response to an impeachment, a witness may not say, "I wasn't asked that in my prior testimony" or the equivalent.



**UNITED STATES DISTRICT COURT  
THE FOURTEENTH JUDICIAL DISTRICT**

UNITED STATES OF AMERICA,

vs.

Case No. 2025-CF-00417

EMILY CALLOWAY

Defendant.

\_\_\_\_\_ /

**NOTICE OF HEARING**

**This Court notices the** Defendant's Motion to Suppress Evidence and Motion to Quash Subpoena for hearing on the 1st day of October 2026, at 9:00 a.m.

1. The parties shall address only the following issues in the following manner on the two aforementioned motions:

- a. By Evidentiary Hearing and Oral Argument:

- i. **Whether Defendant's Motion to Suppress Evidence Obtained in Violation of Court Order should be granted.** The Court finds Defendant, having met its burden to make a threshold showing that Defendant was compelled to testify by court order in Case No. 2024-CF-00416 and the testimony compelled therein relates to allegations made against her in Case No. 2025-CF-00417, is entitled to a hearing under *Kastigar v. United States* on the limited grounds of whether evidence discovered by the United States on November 5, 2024, enclosed herein as Exhibit 19, and the testimony of

Kennedy Parker should be suppressed pursuant to 18 U.S.C. §§ 6002, 6003;  
and,

- ii. **Whether Defendant's Motion to Quash United States Subpoena Duces Tecum on Maddox Armana for the production of any and all records of Armana's interview of Sierra Seton on February 15, 2024, as protected under the work-product privilege should be granted.**

2. Pursuant to the special set status conference held on Saturday, August 1, 2026, the parties shall file with the Court memoranda of law in support of their positions by 5:00 p.m. on September 1, 2026.

/s/ EIB

Judge Elizabeth I. Boals  
United States District Court for the  
Middle District of Florida

**UNITED STATES DISTRICT COURT  
FOR THE FOURTEENTH JUDICIAL DISTRICT**

UNITED STATES OF AMERICA,

vs.

Case No. 2025-CF-00417

EMILY CALLOWAY

Defendant.

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**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

*(Killing of a Witness — 18 U.S.C. § 1512(a)(1)(C))*

On or about December 12, 2023, in the Fourteenth Judicial District, the defendant, EMILY CALLOWAY, together with others known and unknown to the Grand Jury, did knowingly and willfully cause and aid, abet, counsel, or procure the killing of Daniel Blake, with intent to prevent Daniel Blake from communicating to a law enforcement officer of the United States information relating to the commission and possible commission of a federal offense in violation of Title 18, United States Code, Section 1512(a)(1)(C).

**COUNT TWO**

*(Money Laundering Conspiracy — 18 U.S.C. § 1956)*

Beginning on or about September 2018, and continuing through in or about 2024, in the Fourteenth Judicial District, the defendant, EMILY CALLOWAY, together with others known and unknown to the Grand Jury, did knowingly combine, conspire, and agree to conduct financial transactions involving the proceeds of unlawful activity, knowing that the transactions were designed to conceal and disguise the nature, source, ownership, and control of those proceeds, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

JEFFREY GILBERG

Assistant United States

Attorney Fourteenth Judicial

District September 23, 2025

A TRUE BILL

/s/ Katherine Donoghue

Foreperson

1                                   **DEPOSITION OF TATUM SINCLAIR**

2   TATUM SINCLAIR, having first been duly sworn, testified as follows:

3   EXAMINATION BY COUNSEL FOR DEFENDANT:

4   Q: Would you state your full name for the record.

5   A: Tatum Sinclair.

6   Q: What is your occupation?

7   A: Assistant United States Attorney, Fourteenth Judicial Circuit,  
8   White Collar Crime Division.

9   Q: How long have you held that position?

10  A: Going on eighteen years now. Started as a line prosecutor for  
11  the state and then about five years in an opening came up in the  
12  Fourteenth.

13  Q: What kind of cases do you primarily work on?

14  A: As a state prosecutor, I handled a wide range of felonies,  
15  including homicides, before I got promoted into our Economic Crimes  
16  Unit. That's how I got this job working financial crime cases for  
17  the U.S. Attorney's Office.

18  Q: Where are you from?

19  A: Born and raised right here in Gulf Haven. My family's been here  
20  three generations. I barely convinced my mom to let me leave for  
21  college and go out of state for law school. But I told her not to  
22  worry, that I would come right back after I graduated.

23  Q: Can you describe Gulf Haven?

24  A: What can I say? We're a small town. Everyone knows everyone, we  
25  all went to school together, and we're all in each other's  
26  business. But we have one of the best beaches in the country. We  
27  used to be a huge tourist destination, but ever since 2008, the  
28  tourists haven't been coming back. The local hotels and restaurants  
29  took a real hit. I was surprised Silver Palms kept running as long  
30  as they did. I guess now we know why.

31  Q: Describe Silver Palms for us.

32  A: It's massive. When we were growing up, Silver Palms is where  
33  all the fancy folk would go for a staycation, and it was full of  
34  tourists from all over. It sits right on the beach, has over two  
35  hundred guest rooms, eighteen private villas, four exclusive  
36  restaurants, a spa, a conference wing, outdoor event spaces, and  
37  a private beach club. You name it, Silver Palms has it. Or had it.

38 It's been run by the Calloways ever since it opened in 1926. All  
39 of us have either worked, gone to prom, or been married at Silver  
40 Palms.

41 Q: Do you know the Calloways?

42 A: I've known that family my whole life. My own grandmother worked  
43 for Mr. Calloway, III, hosting banquets there in the seventies, if  
44 you can believe that.

45 Q: Did you know Emily Calloway?

46 A: I knew Emily the way everyone knows the Homecoming Queen. Emily  
47 was like Gulf Haven royalty. Don't get me wrong, Emily was nice to  
48 everybody. She always invited all of the kids in her class to her  
49 birthday parties at the resort to make everyone feel included. I  
50 really hoped Emily was going to be able to keep her family's  
51 legacy. It's awful watching it fall apart.

52 Q: Fall apart how?

53 A: Emily inherited the hotel from her parents, Anita and Carlos  
54 Calloway, in 2013 when she was around twenty-eight. I think she  
55 wasn't ready to take on the challenge and was too proud to ask for  
56 help. The problems started small, outgrown lawns or days where it  
57 looked like barely any staff members were there. But over the next  
58 few years, you could tell Emily wasn't maintaining the place. Pool  
59 and roof leaks, missing shingles, one of the restaurants closed,  
60 staff cuts.

61 Q: What changed?

62 A: Donovan.

63 Q: Who's Donovan?

64 A: Saint Donovan. He grew up here too, but he wasn't like the rest  
65 of us. Kept to himself and moved away the second he graduated. All  
66 the sudden, he comes back in 2018 talking about his hot shot New  
67 York City financial advising firm.

68 Q: What was your experience with him?

69 A: I didn't know him personally, but I heard about him. You know  
70 those guys that are the exact opposite of what their name suggests.  
71 That was Donovan and he was anything but saintly. He would tell  
72 anyone who would listen about how he did what it took to rise up  
73 in the competitive NYC market. He wasn't afraid of bending the  
74 rules. He kept bragging around town about his new influencer  
75 friends and how he hosted something called the Flame Festival.  
76 Anyway, he was back in Gulf Haven for a few months when Saint and

77 Emily issued a press release that they were becoming fifty-fifty  
78 partners in Silver Palms.

79 Q: Did that surprise you?

80 A: Yea. Mostly because Saint's last name isn't Calloway. But it  
81 seemed above board at the time. We knew Emily was struggling, had  
82 been struggling for a long time, but it seemed like maybe Saint  
83 was going to help.

84 Q: Did you know how Mr. Donovan and Ms. Calloway were going to  
85 divide responsibilities?

86 A: At the time, no. Throughout my investigation I learned that  
87 Saint took on the financial piece. He handled outside contracting,  
88 company growth, and sales. Emily stayed the public face of Silver  
89 Palms and handled the resort employees, event planning, and any  
90 public appearances they needed to make for the resort.

91 Q: Did you ever interact with Mr. Donovan?

92 A: No. Our paths didn't cross until October of 2023 when Daniel  
93 Blake came to me.

94 Q: Tell me about that.

95 A: Daniel was the resort's accountant, hired in January 2023 after  
96 the prior bookkeeper left. I knew him because in October 2023, he  
97 made a report to local law enforcement about expense patterns at  
98 Silver Palms that didn't add up. He found potentially millions of  
99 dollars in irregularities. Because of the potential fraud claimed  
100 and certain wire payments, local law enforcement referred the case  
101 to us.

102 Q: What did you learn?

103 A: I met with Daniel on October 9, 2023. Daniel told me that Silver  
104 Palms was making payments to vendors that weren't performing actual  
105 work. He saw payments to a company called Emerald Coast Consulting,  
106 LLC. It advertised itself as an outside management company that  
107 would hire external staff or vendors for the resort when needed.

108 Q: How did the payment structure work?

109 A: Emerald would send a bulk invoice to Silver Palms at the end of  
110 every month for general services it contracted out like  
111 groundskeeping, media services, or catering.

112 Q: Why would that be concerning?

113 A: Well, according to Daniel, Emerald wasn't providing sufficient  
114 documentation to back up the charges or Emerald didn't provide  
115 documentation at all.

116 Q: Did Daniel bring you any of these invoices to support his claim?

117 A: He did. Daniel brought me the invoices dated prior to October  
118 2023 that are in Exhibit 1. I could see large charges from outside  
119 vendors for services that Silver Palms had their own employees  
120 for. For example, there's Coastal Event Solutions, LLC, billing  
121 large sums for event services and staffing. But, the event employee  
122 logs showed a sufficient number of Silver Palms employees present  
123 to cover the event.

124 Q: Was it possible that Silver Palms changed its operating model?

125 A: Not according to Daniel. Daniel said he went through the clock  
126 in clock out records for the days external vendors charged Silver  
127 Palms to provide staffing support, but the numbers didn't add up.  
128 He told me he first noticed a problem in April 2023, closing out  
129 the first quarter's books. Coastal Event Solutions, LLC, charged  
130 for services Daniel couldn't match to anything. By July he was  
131 systematically comparing Emerald's invoices against Silver Palms  
132 staffing schedules and event calendars. From there, Daniel said he  
133 started building a file to document everything.

134 Q: Can you give us a specific example?

135 A: Sure. Let's use Coastal Solutions, LLC, as an example. Daniel  
136 walked me through the first quarter of 2023 invoices — that's  
137 Exhibits 1A, 1B, and 1C, and his own staffing comparison at 1D.  
138 Look at January 2023. Emerald listed a charge for \$7,300 on behalf  
139 of Coastal for "guest services and logistics." But thirty-two  
140 Silver Palms employees were scheduled for that event. Again, on  
141 Valentine's weekend, \$8,900 for "special event support," whatever  
142 that means, but nineteen Silver Palms staff were already assigned  
143 to work the event. In March, Silver Palms paid \$19,800 to Coastal  
144 for "general event support," but forty-four Silver Palms worked  
145 that event, covering everything from staffing to media to  
146 housekeeping. Different events, different sizes, same story every  
147 time.

148 Q: Did that seem odd to you?

149 A: Based on the information Daniel was telling me, yes. But I  
150 didn't have enough evidence to do anything formally. And Daniel  
151 agreed to keep working on the case as an inside source. I wasn't  
152 going to do anything that would jeopardize his direct access to  
153 keep collecting these records.

154 Q: What did you do at this point?

155 A: Opened a file and started looking into the publicly available  
156 records for the principal payees: Tidewater Hospitality Partners,  
157 LLC, Seagrove Staffing Group, LLC, Dune & Palm Logistics, LLC, and

158 Coastal Event Solutions, LLC. I found their incorporation records  
159 for these companies and started looking into their registered  
160 addresses and agents.

161 Q: Did you find that information?

162 A: Yes, that's reflected in Exhibit 2. The records confirmed the  
163 registered agent for Emerald was Saint Donovan. But the registered  
164 agents for Tidewater, Seagrove, Dune & Palm, and Coastal were all  
165 the same person. Ky Chandler.

166 Q: Did you learn anything else about those corporations at that  
167 time?

168 A: Yes, we also had their registered addresses. I drove out to the  
169 office for Coastal, just to see what was there, but it was an empty  
170 office. I took photos of the outside and inside of Coastal's  
171 registered office.

172 Q: Are those the two photos in Exhibit 3?

173 A: Yes.

174 Q: Who is Ky Chandler?

175 A: Don't know. Never met the guy. And in October 2023, working  
176 from public records alone, I couldn't find a trace of him. No  
177 property in the county, no vehicle registration, no professional  
178 license, nothing with a Gulf Haven address other than that closet  
179 of an office. In a town where everyone knew everyone, nobody knew  
180 Ky Chandler.

181 Q: Did you subpoena the bank records for those companies?

182 A: No, we didn't have concrete evidence that the accounts were  
183 being using a criminal scheme yet.

184 Q: In October 2023, did Mr. Blake tell you anything else?

185 A: Yes. He went to the address listed for Coastal Event Solutions,  
186 LLC, drove over there himself to see the office. But nothing was  
187 there. Just a small closet of an office and no one inside.

188 Q: Did Mr. Blake ever raise his concern with Emily Calloway or  
189 Saint Donovan?

190 A: Yes. Daniel said he first raised a concern over the vendor  
191 charges with Emily in April 2023. But Emily told him to approve  
192 whatever Emerald charged. He tried to speak with her again on  
193 September 5, 2023, but Emily got angry and yelled at Daniel to  
194 back off and leave it alone.



195 Q: When Daniel confronted Ms. Calloway, was it just over the  
196 Coastal itemizations?

197 A: No. He confronted her about all of the invoices submitted by  
198 any outside vendor for that time.

199 Q: When was the next time you communicated with Mr. Blake?

200 A: Daniel would send me updated invoices as he found them, but we  
201 didn't speak again until Saturday, December 9th. He called me and  
202 he was so excited. More excited than I'd ever heard him. Daniel  
203 said he'd had a breakthrough and finally found the piece that tied  
204 it all together. He had been tracking and looking in to the wire  
205 transfers on his end. He believed he found the connection to the  
206 true owner of the Coastal account.

207 Q: What was the connection?

208 A: Daniel didn't want to get into the specifics over the phone. He  
209 was a little paranoid that he was being watched. So, he wanted to  
210 wait to lay it all out for me in person. We agreed he would come  
211 in first thing next week and he would bring all of the new evidence  
212 connected to the Coastal account.

213 Q: Did you meet with Mr. Blake that week?

214 A: No. Daniel was murdered before he and I could meet.

215 Q: What day was Mr. Blake murdered?

216 A: Daniel was killed in the evening of December 12, 2023. Shot in  
217 his office at Silver Palms while he was working late.

218 Q: Before we talk more about that investigation, I have to ask,  
219 you're a financial-crimes prosecutor. How did you become involved  
220 in a homicide?

221 A: Because Daniel was already cooperating with me as a source in  
222 an active federal financial investigation. The moment I learned  
223 he'd been killed, it was clear to me that this was bigger than  
224 even Daniel knew and someone was willing to kill him to keep it  
225 hidden. Daniel was a good man. He deserved better.

226 Q: Were you working on this case with a team?

227 A: Yes. My old friend, FBI Special Agent Bryce Nolan and his team  
228 came on to help. Bryce is a financial fraud expert, and it just so  
229 happens that we grew up together, even worked as lifeguards at the  
230 resort the same summer. I'm still not over the day we lost the  
231 annual Silver Palms Karaoke Night. If you saw us perform the  
232 number, you would get it. We were robbed.

233 Q: Can we go back to Mr. Blake's murder?

234 A: Yes, sorry. Bryce and I worked the investigation together for  
235 the better part of a year.

236 Q: Take me through the investigation. What did you do first after  
237 Daniel was killed?

238 A: Started looking for witnesses and evidence. I already had  
239 Daniel's working file containing the materials he put together and  
240 sent to me before his murder. What I didn't have was whatever he  
241 found that last week before he died.

242 Q: Was it in his office?

243 A: No. Right after we cleared the scene, we got a warrant and  
244 searched Daniel's office. But, like you can see in Exhibit 4,  
245 someone had ransacked the place. Drawers emptied, surfaces  
246 cleared. Whatever he'd been about to bring me was gone. The one  
247 thing left was Daniel's own index, Exhibit 5, that we found shoved  
248 way inside of a desk drawer. It was a list of what he'd assembled.  
249 Most of it matched what I already had. But one entry pointed to a  
250 folder that wasn't there.

251 Q: Did you look anywhere else for any missing materials?

252 A: Everywhere we could. I spoke with Daniel's friends and family.  
253 We searched his apartment. We went through his home computer, his  
254 desk, his drawers, but nothing. Whatever Daniel found that last  
255 week has never been recovered.

256 Q: Did you find any evidence of who was in Mr. Blake's office  
257 immediately prior to his death?

258 A: Yes. We pulled surveillance footage from the hotel which put an  
259 individual exiting Daniel's office around the time of his death.  
260 Luckily, the camera caught a shot of his face. That individual was  
261 later identified on January 20, 2024.

262 Q: What did you do next?

263 A: Arrested him and got warrants for his phone and bank records.  
264 The bank records came back January 25, 2024, and included a check  
265 made payable to "Cash," memo line "maintenance work". The check  
266 was drawn on the account for Emerald Coast Consulting, LLC, and I  
267 couldn't believe it, but Saint Donovan was the person who signed  
268 it.

269 Q: Is what is marked as Exhibit 6 that check?

270 A: Yes.

271 Q: Wow. What did that do for your investigation?

272 A: It was huge and our first concrete piece of evidence that would  
273 crack the door open to Emerald's banking records. When we found  
274 the account and interviewed the guy who shot Daniel, he started  
275 singing like a canary. He told us that Saint Donovan hired him to  
276 kill Daniel Blake. We arrested Donovan the following day, January  
277 26, 2024, for homicide.

278 Q: Not money laundering?

279 A: Not yet. We still needed more records, but we weren't gonna let  
280 Donovan keep walking around a free man.

281 Q: Did Mr. Donovan make any statements?

282 A: No, he said he wasn't going to answer any questions and then  
283 started demanding his lawyer and his beloved pillow. He's never  
284 spoken with us to this day.

285 Q: Did you get a warrant for any of Mr. Donovan's records?

286 A: Yes. We immediately sought out search warrants for his phone  
287 and associated bank records.

288 Q: Let's start with the phone. What did you find there?

289 A: Not a lot. The phone looked nearly wiped clean, but we found  
290 the phone call from Donovan to the hired gun. But then, we also  
291 found a phone call and a text between Donovan and Ms. Calloway.  
292 The call and text are both reflected in Exhibit 7.

293 Q: Why is that odd if they're business partners?

294 A: Because these communications weren't during business hours. The  
295 records showed a five-minute call from Emily to Donovan at 11:47  
296 p.m. on December 10, 2023. After Emily ended the call with Donovan,  
297 she sent him a text that just said, "Handle it."

298 Q: Did you ever learn what Ms. Calloway meant by "handle it"?

299 A: Later in the investigation we learned that Daniel and Emily  
300 were seen arguing at a staff holiday party right before those  
301 communications were made.

302 Q: We'll come back to that party in a little bit. Did you try to  
303 speak with Ms. Calloway?

304 A: We tried, but she invoked.

305 Q: When did you start receiving the Emerald bank records back from  
306 the warrants?

307 A: We got the Emerald bank records back on February 1, 2024.  
308 Exhibit 8 is a summary of those records.

309 Q: What was in them?

310 A: The records provided the history of Emerald paying large monthly  
311 sums to Tidewater, Seagrove, Dune & Palm, and Coastal going back  
312 years. That was very odd given that each of these companies were  
313 all created within one month of Emerald in 2018 and the only  
314 payments they ever received were from Emerald.

315 Q: What did you do next?

316 A: We subpoenaed the records for each of the companies that  
317 received payouts from Emerald. We went after bank records,  
318 corporate records, hotel records, and really any other record we  
319 could find associated with them.

320 Q: Did you learn any other information about who was associated  
321 with the four vendors created in 2018?

322 A: We were able quickly determine that these were just shell  
323 corporations operating with a nominee owner.

324 Q: What is a nominee owner?

325 A: A nominee owner, is a person that is officially listed as the  
326 owner of a company, but they are really just holding the funds for  
327 someone else.

328 Q: Did these four companies have a nominee owner?

329 A: Yep. Ky Chandler. Chandler would receive the funds from Emerald  
330 into each account and then transfer those funds into separate  
331 accounts held by the true owners.

332 Q: So, Ky Chandler was the guy receiving all of this money from  
333 Emerald and quietly shuffling it around to its correct person?

334 A: Exactly.

335 Q: And how could you be certain that these corporations  
336 specifically were using a nominee owner?

337 A: We were able to follow the payments from Silver Palms to  
338 Emerald, and to Tidewater, Seagrove, Dune & Palm, and Coastal,  
339 respectively. But every time these companies received a payout,  
340 that money, or a large portion of it, was transferred to another  
341 corporate bank account. Tidewater, Seagrove, and Dune & Palm were  
342 all making transfers to accounts based in the U.S., so we were  
343 able to trace them back to their owner, who was not Ky Chandler,  
344 but three individuals in New York unrelated to Silver Palms. Those  
345 folks are now the subjects of separate investigations.

346 Q: You didn't include Coastal in that last list.

347 A: I didn't. The true owner of Coastal was smarter and wired their  
348 funds to an account based in the Cayman Islands held by Marsh  
349 Holdings Ltd. So, we could only see the money going out of Coastal  
350 and into the Marsh-Cayman account, but without jurisdiction, our  
351 path ended there. We couldn't see the Marsh-Cayman owner.

352 Q: I want to break down what we do know about those payments. What  
353 can you tell us?

354 A: If you look at Coastal's bank records in Exhibit 9, you can see  
355 a few unique issues. First, when we looked at the money coming in  
356 and confirmed Emerald paid Coastal over seven million dollars  
357 between 2019 and 2023. Those were the largest vendor payments in  
358 this entire network. All going to an event solutions company  
359 operating out of an empty office. Yea right.

360 Q: What else?

361 A: Then we looked at the money going out of the Coastal account.  
362 Some of those transactions appeared to be legitimate company  
363 expenditures. Small amounts marked payroll that lined up with  
364 reports that one or two Coastal employees would sometimes work the  
365 events at Silver Palms or make purchases for resort audio and  
366 visual equipment. But the main payments going out of the Coastal  
367 accounts were to the Marsh-Cayman account.

368 Q: What kind of payments?

369 A: From 2019-2023, we found nineteen transfers from Coastal to the  
370 Marsh-Cayman account totaling over seven million dollars.

371 Q: Could you take any steps to determine the owner of the Marsh-  
372 Cayman account?

373 A: In June 2024 we submitted a formal treaty request, an MLAT, to  
374 the Caymans asking for information on the account's ownership.  
375 That request was still pending when the investigative wall went  
376 up.

377 Q: I want to pause for a moment because we've talked a lot about  
378 Coastal and these other vendors, but not Ms. Calloway. What does  
379 Ms. Calloway have to do with this?

380 A: We knew Emily held fifty percent ownership of Silver Palms. We  
381 knew from Daniel that Emily told him to approve whatever Saint  
382 directed, and on two separate occasions told Daniel to back off.  
383 That led us to believe Emily was involved in this shell structure  
384 in some way. We had already ruled out Tidewater, Seagrove, and  
385 Dune & Palm. That left Coastal. We believed that's where Emily  
386 came in, but we didn't have the evidence to back it up yet.

387 Q: Could you identify any other individuals associated with  
388 Coastal?

389 A: We identified a woman named Sierra "Si-Si" Seton. She was listed  
390 as an operations manager on one of the payroll transactions.

391 Q: Did you interview her?

392 A: By the time we got that name in the spring of 2024, she was  
393 already gone. She left the country in March 2024 with Ky Chandler  
394 according to flight records. Last we heard they were somewhere off  
395 the coast of Spain, but we haven't been able to confirm their exact  
396 location through any investigative efforts.

397 Q: What was the next step you took in your investigation?

398 A: We still had a lot of work to do, including gathering lists of  
399 relevant employees and conducting interviews.

400 Q: How large is the staff population at Silver Palms?

401 A: Huge. It's the largest employer in Gulf Haven. From 2019-2023,  
402 right around a hundred people cycled through the payroll. Events  
403 staff, banquets, housekeeping, food and beverage, front desk,  
404 grounds, security, the spa, the beach club, valet. A full resort  
405 operation.

406 Q: How did you get a list of the employees?

407 A: We subpoenaed the employee roster from Silver Palms early on in  
408 February 2024. We got a list of everybody who worked there  
409 throughout that period, their departments, and their hire and  
410 separation dates. That's all compiled in Exhibit 10.

411 Q: How did you decide who to talk to first?

412 A: Agent Nolan and I sat down together and worked that out when we  
413 got the records initially. This is way before the Calloway  
414 testimony. We looked for the people who'd been there the longest  
415 and worked the most events. We prioritized by tenure and by how  
416 often somebody worked the floor. Long-serving, high-frequency  
417 staff first.

418 Q: Did you document your interviews?

419 A: Yes. The ones relevant to this matter are summarized in Exhibit  
420 11.

421 Q: What was your impression of the staff's awareness of what was  
422 going on?

423 A: That was the thing that struck me. These were good people.  
424 Dozens of them, some there twenty years, and they ran a beautiful

425 hotel. Weddings, galas, conferences, every weekend. And this whole  
426 scheme was running right through the middle of all of it: the  
427 events they staffed, the invoices they never saw, the vendors that  
428 barely showed up. It was embedded in the resort's daily operations,  
429 but nobody I talked to had the faintest idea. The only person who  
430 ever looked closely enough to see it was Daniel, and it was his  
431 job to look at the numbers.

432 Q: Tell me about some of those interviews.

433 A: Sure. Brie Collins was one of the first. She runs events and  
434 banquets, been there since 2019. If anybody would know who staffed  
435 a given gala, it's Brie. She told us Silver Palms events were run  
436 by Silver Palms people. We asked her about some of the specific  
437 2023 events where Emerald had billed Coastal, and she only  
438 remembered seeing one or two Coastal employees at any time. She  
439 confirmed that she was responsible for most of the event  
440 organization and operation. She'd never heard of Ky Chandler. And  
441 she had nothing but nice things to say about Emily. I asked Brie  
442 whether it ever struck her as odd that a staffing company was  
443 billing for events her own people worked. She said no, she figured  
444 Coastal filled in gaps, that's what the office told her. She never  
445 thought about it beyond that. She said, "Whenever I needed  
446 something for an event, people, decorations, funding, whatever, I  
447 told Saint or Emily and it would appear."

448 Q: Anyone else?

449 A: Colby Lawson. Colby works the dock down at the beach club, what  
450 a character. Everyone that passed by when I spoke with him called  
451 him "AI," don't ask me why. Colby follows Brie around like a  
452 duckling, so where Brie went, Colby went, and he ended up on our  
453 list that way. Colby didn't know a thing about vendor billing or  
454 anything really. When I asked him about working with Ms. Calloway,  
455 he just laughed and said, "Oh, Ms. Emmaa-leeeee. She's cool." At  
456 the end of our interview, he asked if he could leave because he  
457 and Brie were having a movie night.

458 Q: Who else did you speak with?

459 A: Sunshine Delray. She manages the spa, been there since 2019.  
460 Since she's a department head, she's around ownership more than  
461 most. Sunshine was the one who booked all the VIPs, CEOs, and any  
462 celebrities for spa treatments.

463 Q: Did Ms. Delray know anything about Coastal?

464 A: No. "Coastal" was just a word on a vendor list to her, but she'd  
465 never laid eyes on a single one of them. She did mention that a  
466 man from some company called "Tidewater" came in for a massage

467 once. Said Saint had told her to treat him as a VIP, so she  
468 remembered the name. He tipped well. She didn't think anything of  
469 it. She also had a lot to say about Saint Donovan. Apparently, he  
470 took her on a date once and she's never gotten over it. Before all  
471 this happened, she thought Saint would leave the hotel and Emily  
472 behind to run away with her. Clearly that's not happening now.

473 Q: And the last one?

474 A: Sean Boothe. Grounds security, since 2019, good guy. Sean's the  
475 one who sees everything on that property. Every delivery, every  
476 outside crew, everybody coming and going. Sean didn't recall seeing  
477 someone in a Coastal polo more than once and hadn't heard of  
478 Chandler. What Sean did say, and he was careful about it, was that  
479 the way he understood it, Saint ran the money and the outside  
480 contracts, and Emily ran the resort. I asked Sean if any other  
481 employees would know about the hotel financials and he confirmed  
482 that would've only been Emily, Saint, and Daniel. No one else.

483 Q: Did Mr. Boothe know anything about Daniel Blake?

484 A: A little. Sean said Daniel was always the last light on in the  
485 admin wing, working late. Sean did frequent security passes through  
486 that wing and described Daniel's office the way everyone did:  
487 organized chaos. Highly organized file stacks but so many stacks  
488 and binders that it covered every available surface. That stuck  
489 with me later, because it was the opposite of how we found that  
490 office after the murder.

491 Q: Did you learn anything else?

492 A: Yes. Several employees reported seeing Daniel and Emily have  
493 some kind of tense exchange at the Silver Palms Staff Christmas  
494 party on December 10, 2023. That is actually one thing Colby did  
495 know. It was also reported by Sean Boothe. Nobody we spoke to could  
496 tell us what the fight was about, but we could place the argument  
497 as happening sometime before 11:47 p.m.

498 Q: So, prior to August 2024, did any records in your possession  
499 connect Emily Calloway to Coastal?

500 A: One thing did. Coastal's incorporation paperwork from 2018  
501 listed a contact phone number. It was a prepaid cell whose service  
502 had lapsed by early 2023, so it was dead by the time we found it.  
503 We subpoenaed the historical toll records in the spring of 2024,  
504 and we were lucky the carrier still had them, but we didn't get  
505 them back for months.

506 Q: What did those records show?



507 A: Over four years, that phone had regular contact with exactly  
508 two numbers. One belonged to Saint Donovan. The other belonged to  
509 Emily Calloway. There were dozens of calls between that prepaid  
510 number, Donovan, and Emily.

511 Q: In the summer of 2024, what was the status of the case against  
512 Saint Donovan?

513 A: Donovan was charged with homicide and money laundering and the  
514 case was gearing up for trial. We had strong evidence of the  
515 homicide: the video, the money trail, and the hitman-turned-  
516 government witness. But with Daniel Blake dead and Ky Chandler and  
517 Sierra Seton on the lam, we were having difficulty figuring out  
518 how to make Donovan's shell corporation game make sense to a jury.

519 Q: What made that difficult, specifically?

520 A: Anybody can look at a spreadsheet and see money moving in a  
521 circle. What we needed was somebody who could stand in front of a  
522 jury and explain the structure: why Emerald existed, how the  
523 payments to vendors worked, which of it was real and which of it  
524 wasn't, and why an outside observer should believe any of that was  
525 criminal rather than sloppy bookkeeping at a hotel that  
526 legitimately used a lot of outside labor.

527 Q: So, what did the government do?

528 A: Bryce and I started discussing whether Emily Calloway was the  
529 witness who could fill that gap. Emily was the one person left  
530 standing who understood how Saint, Emerald, and the outside vendors  
531 worked from the ownership level down. We asked Emily's attorney  
532 one more time if she would cooperate. Surprise, they said no. We  
533 then discussed compelling Emily's testimony against Saint with a  
534 subpoena.

535 Q: You understood there was a cost.

536 A: Of course. A subpoena meant Emily would receive use and  
537 derivative-use immunity which meant restricting, permanently, what  
538 we could ever use against her directly. Everyone in that room  
539 understood the tradeoff and we decided we couldn't take the risk  
540 of losing the fraud charge against Donovan. We knew he was the  
541 ringleader.

542 Q: I'm showing you what's been marked Exhibit 12. Do you recognize  
543 it?

544 A: Yes. This is the order under 18 U.S.C. sections 6002 and 6003,  
545 entered August 23, 2024, compelling Emily's testimony and  
546 conferring use and derivative-use immunity.

547 Q: What happened after that order was entered?

548 A: The investigation split into two teams. I led Team Donovan,  
549 continuing to prosecute Donovan and handle Emily's compelled  
550 testimony. Team Calloway, led by Bryce Nolan, would continue  
551 investigating Emily but was walled off from any information given  
552 by Emily under the immunity order.

553 Q: Did you meet with Emily?

554 A: Yes. Pursuant to the order, I met with Emily and her counsel on  
555 August 28, 2024, to get an understanding of her testimony.

556 Q: Without stating any specifics, what generally did you discuss  
557 with Emily?

558 A: The resort's history, the partnership with Saint, how Emerald  
559 and all of the shell corporations worked, Daniel's concerns, and  
560 the events leading up to Daniel's death.

561 Q: Prior to August 28, 2024, did the government know what that  
562 Christmas party argument was about, from any source?

563 A: No. We knew from the earlier interviews that an argument  
564 happened. We knew from phone records that a call followed it.  
565 That's it.

566 Q: Prior to August 2024, did the government know who was present  
567 at the Christmas party?

568 A: Attendees would have been on the employee list we had at that  
569 time.

570 Q: Prior to August 2024, had you focused on Kennedy Parker as a  
571 person with information relevant to your investigation?

572 A: Honestly, I couldn't tell you that I had. There were a lot of  
573 names on those lists. I don't have any independent memory of  
574 thinking Kennedy Parker mattered one way or the other before August  
575 2024. Whether Team Calloway did anything else with those employee  
576 records after the wall went up, I can't say.

577 Q: Since August 23, 2024, have you had any involvement in the case  
578 against Emily Calloway?

579 A: No.

580 Q: You've previously stated that you and Agent Nolan are old  
581 friends. Have you spent time together following Ms. Calloway's  
582 testimony?

583 A: We grab lunch or a beer from time to time, like we always have.  
584 And we're preparing a run at the Silver Palms Alumni Karaoke  
585 contest for 2027, so we keep a tight practice schedule. New  
586 management must have realized the old judges got it wrong.

587 Q: From high school?

588 A: Karaoke is forever.

589 Q: When did Mr. Donovan's trial begin?

590 A: The trial began October 7, 2024, and he was convicted on October  
591 24, 2024.

592 Q: Was Ms. Calloway's testimony public?

593 A: Yes, open courtroom, and it was heavily covered by local press.  
594 Gulf Haven is not a large media market, but a case like this,  
595 involving the Calloway family and a murder at the resort, that's  
596 front-page for weeks.

597 Q: Was all of Ms. Calloway's testimony broadcast on local media  
598 channels?

599 A: As far as I know, yes.

600 Q: What was your involvement in the investigation of Emily Calloway  
601 after that?

602 A: None.

603 *[Deposition adjourned.]*

604 I, Tatum Sinclair, have read the foregoing deposition transcript  
605 and hereby affix my signature that the same is true and correct.

606 /s/ Tatum Sinclair

1 EXCERPTS FROM THE DEPOSITION OF BRYCE NOLAN

2 BRYCE NOLAN, having first been duly sworn, testified as follows:

3 EXAMINATION BY COUNSEL FOR DEFENDANT:

4 Q: Would you state your name for the record.

5 A: Bryce Nolan.

6 Q: What do you do for a living?

7 A: I'm a Special Agent with the Federal Bureau of Investigation,  
8 assigned to the field office that covers the Fourteenth Judicial  
9 Circuit.

10 Q: How long have you been with the Bureau?

11 A: Sixteen years. I started as a general field agent supporting  
12 local investigations into complex homicides and organized crime.  
13 Nine years ago, I was promoted into the Money Laundering,  
14 Forfeiture, and Bank Fraud Unit. It's basically a task force that  
15 targets professional facilitators of illegal financial networks.

16 Q: Do you have any specialized training relevant to this case?

17 A: Yes. I've been trained in financial forensics and analysis,  
18 with a specialized focus in money-laundering schemes and financing  
19 routes. My training includes tracing complex corporate balance  
20 sheets, shell companies, and offshore accounts. I'm also trained  
21 to use specialized financial database software, tracking various  
22 types of currency, and processing large digital ledger data. I  
23 also completed a certification course on cell phone investigative  
24 technology and radio frequency engineering to be trained in reading  
25 records of phone usage. I've qualified as an expert in cellphone  
26 technology and financial forensics more than twenty times.

27 Q: Are you from Gulf Haven?

28 A: Been here my whole life, same as half the people in this  
29 building. I only left to go train with the Bureau.

30 Q: Do you know AUSA Tatum Sinclair?

31 A: Yes, we grew up together and we've always had a strong  
32 friendship. We were lifeguards at Silver Palms the same summer, if  
33 you've heard about that.

34 Q: I have, actually. Something about karaoke.

35 A: I'm told the recording no longer exists. I'd prefer it stay  
36 that way. Sinclair would tell you otherwise.

37 Q: Let's talk about this matter. Tell us about how you became  
38 involved.

39 A: AUSA Sinclair brought me in right after Daniel Blake was killed  
40 on December 12, 2023. Mr. Blake had been an inside source in a  
41 financial investigation Sinclair was already running. I worked  
42 both the laundering and homicide cases alongside Sinclair as one  
43 investigation for most of 2024.

44 Q: What was your role, specifically?

45 A: I was the lead case agent on the investigative side. I ran the  
46 field work sending out subpoenas, conducting records analysis,  
47 coordinating the other agents, tracing corporate filings and bank  
48 records, and running down leads.

49 Q: What did you learn about Mr. Blake's death?

50 A: By late January 2024 we had identified the individual who shot  
51 Mr. Blake, from hotel surveillance. We arrested him. His bank  
52 records came back on January 25, 2024, and included a check drawn  
53 on the account of Emerald Coast Consulting, payable to "Cash,"  
54 with a memo line reading "maintenance work." The bank's own records  
55 tied that check to the account Saint Donovan controlled. The  
56 shooter then admitted Donovan had hired him. We arrested Donovan  
57 on January 26, 2024. He invoked and never gave a statement.

58 Q: What did you learn about the fraud allegation?

59 A: Sinclair caught me up on the information Mr. Blake brought in,  
60 everything in Exhibit 1. When we searched Blake's office after the  
61 murder, we were looking for what he'd found that last week, the  
62 breakthrough he'd called Sinclair about. We didn't find it. The  
63 drawers were emptied and the files were gone. What we did recover  
64 was Mr. Blake's own index of his materials. That's Exhibit 5. Most  
65 of the entries matched what Sinclair already had. One did not. It  
66 read, in his hand, "Coastal-beneficial owner of Cayman account"  
67 with "this is it" written next to it. But there was no such folder  
68 anywhere in the office.

69 Q: So, if you couldn't find that file, what did you do at the  
70 point?

71 A: We moved quickly against Emerald with what we had. We subpoenaed  
72 Emerald's bank records, those came back on February 1, 2024, and  
73 they showed Silver Palms paying Emerald large monthly sums. Emerald  
74 would then pay out a list of external vendors including Tidewater  
75 Hospitality Partners, LLC, Seagrove Staffing Group, LLC, Dune &  
76 Palm Logistics, LLC, and Coastal Event Solutions, LLC.

77 Q: Why was that significant?

78 A: Before Mr. Blake was killed, we pulled the incorporation records  
79 for these companies. We found that they were all formed the same  
80 month, with the same registered agent, and the same kind of vague  
81 billing. That was a big red flag to us and we knew there was likely  
82 a large shell corporation scheme happening in the books at Silver  
83 Palms.

84 Q: What did you do next?

85 A: After we had the check from Emerald to Mr. Blake's killer, we  
86 tried to track who was receiving the payouts from each of the shell  
87 corporations. We subpoenaed the bank records of each company that  
88 took money from Emerald, plus corporate filings, hotel records,  
89 and anything else we could tie to those entities. Tidewater,  
90 Seagrove, and Dune & Palm all traced to a different, identifiable  
91 person we could name and locate. None of which are related to Ms.  
92 Calloway. The problem was we still couldn't find the recipient of  
93 the Coastal payments.

94 Q: We'll come back to Coastal in just a moment, but I want to first  
95 walk through the other vendors.

96 [ . . . ]

97 Q: Okay, let's turn back to Coastal Event Solutions, LLC. You said  
98 you couldn't find the recipient of the Coastal payments. Didn't  
99 Coastal have a registered agent in its incorporation paperwork?

100 A: It did. Ky Chandler. But Chandler was like a ghost. No bank  
101 accounts. No payouts. Nothing. We did find one record listing an  
102 operations manager for Coastal, Sierra Seton. But both Ky Chandler  
103 and Sierra Seton disappeared. Allegedly, they ran away together  
104 and were last seen somewhere off the coast of Spain.

105 Q: What about a corporate office?

106 A: Mr. Blake was right about that. Coastal's address on its  
107 incorporation filings traced back to an empty shoe box of an office  
108 across town. That didn't line up with the amount of money coming  
109 in.

110 Q: How much money was coming in?

111 A: We found over seven million dollars wired to Coastal from  
112 Emerald from 2018 to 2023. But Coastal would then wire the funds  
113 to a different bank account in the Caymans, and once its money  
114 went offshore, we couldn't follow it.

115 Q: Did you try?

116 A: Yes. In June of 2024 we submitted a Mutual Legal Assistance  
117 Treaty request, an MLAT, to the Cayman authorities, asking them to

118 identify the beneficial owner behind that holding company. That's  
119 the formal channel for getting that kind of information from a  
120 foreign bank.

121 Q: Did the MLAT request ever identify the owner of that account?

122 A: No. The MLAT came back in October 2024 and it was a dead end.  
123 We could only identify the holding company on the account. That's  
124 it. The trail stopped there. We never independently unmasked the  
125 owner through the treaty process.

126 Q: Were there any other records you could tie back to Coastal?

127 A: Coastal's account-opening paperwork listed a prepaid cell as  
128 its contact number. By the time we found it the service had lapsed,  
129 so the phone itself was dead, but we subpoenaed the historical  
130 toll records. Over about four years, that phone had contact with  
131 exactly two numbers. Those numbers were registered to Saint Donovan  
132 and Emily Calloway. Dozens of calls between them.

133 Q: What became significant about those phone records?

134 A: Based on Mr. Blake's reports prior to his death, we suspected  
135 that Ms. Calloway was involved somewhere in the scheme. She  
136 repeatedly told Mr. Blake to back off of the invoices involving  
137 those outside vendors, and we located the owners of the other three  
138 principal payees. Coastal was the only piece left she could be  
139 connected to, but the phone calls alone weren't enough.

140 Q: Why not?

141 A: Even if Ms. Calloway was running a shell game, she still owned  
142 a resort that was providing legitimate services to guests. And  
143 there was evidence that Coastal performed at least some real work  
144 for Silver Palms. We didn't have any evidence of what those phone  
145 conversations were about, so all Ms. Calloway would have to say is  
146 that she was speaking with Coastal about events at Silver Palms.

147 Q: What was the evidence of real work performed by Coastal?

148 A: Some Silver Palms employees reported seeing at least one or two  
149 Coastal workers helping staff the events on the 2023 invoices.  
150 There was at least some amount of genuine payroll.

151 [ . . . ]

152 Q: Let's talk about the decision to compel Emily Calloway's  
153 testimony. What went into that decision?

154 A: Over the spring and summer of 2024. We had a strong murder case  
155 against Donovan and a decent laundering case, but we had a gap: we  
156 couldn't put a witness in front of the jury who could explain the  
157 structure of the shell corporations from the inside. Evidence of

158 why Emerald existed, how the money actually moved, which of  
159 Coastal's work was real and which wasn't, and who was really behind  
160 the companies.

161 Q: What about the individuals you associated with Tidewater,  
162 Seagrove, and Dune & Palm?

163 A: They all invoked. And they didn't have any other connection to  
164 Silver Palms to be able to explain how the scheme ran throughout  
165 the resort.

166 Q: Who else was left?

167 A: Well, Mr. Blake was dead. Sierra Seton and Ky Chandler had left  
168 the country. Sinclair and I thought Emily Calloway, as a Silver  
169 Palms owner, was likely the one remaining person who could explain  
170 the structure of the payments flowing out of Silver Palms down to  
171 the shell corporations. Ms. Calloway declined to cooperate  
172 voluntarily, so we made the decision to seek a court order  
173 compelling her testimony against Donovan. The order was entered  
174 August 23, 2024, and Ms. Calloway was scheduled to speak with the  
175 prosecutors on August 28, 2024.

176 Q: Why did you have to compel Ms. Calloway's testimony at that  
177 moment?

178 A: Donovan's trial was coming up fast in October. We were running  
179 out of runway to build the part of the case that explained the  
180 structure. We made a judgment call and that's why we moved to  
181 compel her when we did.

182 Q: What did that decision mean for you?

183 A: It meant we were going to have to split into two teams and "wall  
184 off" from each other. Team Donovan continued prosecuting Donovan  
185 and would receive Ms. Calloway's compelled testimony. Team  
186 Calloway, which I led, would keep investigating Ms. Calloway's own  
187 involvement in Mr. Blake's death and the fraud scheme but we would  
188 be walled off from anything in Ms. Calloway's testimony.

189 Q: What does "walled off" mean in concrete terms?

190 A: It means the people investigating Ms. Calloway could not  
191 receive, or be made aware of, the content of her compelled  
192 statements, could not receive anyone's strategic impressions drawn  
193 from them, and could not follow any investigative lead that came  
194 out of them.

195 Q: Why didn't you call in another Special Agent who had no  
196 knowledge of the case to lead the Calloway team?



197 A: For that exact reason. Sinclair and I had the most knowledge of  
198 this case and had worked it the longest. We decided both cases had  
199 a higher chance of success if one of us stayed with each, and we  
200 were confident we could construct an investigative wall before Ms.  
201 Calloway testified.

202 Q: How did you implement that wall?

203 A: On August 22, 2024, Sinclair and I met to divide the supporting  
204 case agents and prosecutors between Team Donovan and Team Calloway.  
205 We duplicated the existing case file so that each team had its own  
206 copy. I wrote a formal memorandum of the wall-off procedures, and  
207 from that point on the two teams worked separately. The compelled  
208 testimony and any tactical changes derived from it were kept on  
209 the Donovan side, access-restricted. On the Calloway side, I kept  
210 a record of what we already had before the wall went up, so there'd  
211 be a clear line between what was independent and what wasn't. Those  
212 reassignments and the access restrictions are documented in the  
213 memo I prepared that week.

214 Q: Is that formal protocol the one we see in Exhibit 15?

215 A: Yes.

216 Q: Was there a written wall protocol before August 22, 2024?

217 A: No. Before the immunity order there was nothing to wall off  
218 yet, because Ms. Calloway hadn't been compelled to say anything.  
219 What existed before then was the result of ordinary investigative  
220 procedure. The formal separation came after.

221 Q: Do you believe the wall held?

222 A: I do. The last time Sinclair and I discussed this case was  
223 August 22, 2024, when we divided the teams. I never received Ms.  
224 Calloway's compelled testimony. I'm not aware of what she testified  
225 to, or of what impression, if any, her testimony left on the  
226 prosecutors trying Donovan. The evidence my team developed against  
227 Ms. Calloway came from records and witnesses we could reach  
228 independently.

229 Q: I'm showing you what's been marked as Exhibit 16. Do you  
230 recognize it?

231 A: Yes. This is an investigative to-do list I wrote for Team  
232 Calloway.

233 Q: When did you write it?

234 A: Between August 23 and August 27, 2024.

235 Q: How do you know it was that week and not later?

236 A: In the formal wall-off procedure, we decided that every piece  
237 of new evidence or investigative note received or made after August  
238 23, 2024, would be marked as Team Calloway or Team Donovan. So, if  
239 a member of one team ever came across material belonging to the  
240 other, they'd know immediately to put it down. This note is marked  
241 Team Calloway.

242 Q: Are you aware of any member of Team Calloway ever seeing a  
243 document or note from Team Donovan?

244 A: No.

245 Q: Why did you write this list of investigative steps?

246 A: I knew that when we began building the case against Ms.  
247 Calloway, it wasn't going to be easy connecting her to Mr. Blake  
248 or the money laundering scheme. Her name wasn't on anything, but  
249 we knew she was involved. That meant, like in any investigation,  
250 we had a lot of work ahead of us. I'm also aware of how carefully  
251 judges scrutinize government investigators doing work after  
252 immunized testimony. The only way to preserve what would otherwise  
253 be our normal investigative process in a situation like this was  
254 to document it before Ms. Calloway testified.

255 Q: Walk me through what this note says.

256 A: It's a working list of what the Team Calloway still needed to  
257 do. Audit work performed by the vendors. Follow up on the corporate  
258 filings. Chase the MLAT, which was still pending when the wall  
259 went up. And circle back to the Silver Palms employees we hadn't  
260 interviewed in the original investigation. They were the ones most  
261 likely to have seen whether the vendors' billed work actually  
262 happened or provide any other relevant information we didn't have  
263 yet.

264 Q: Is there a list of employees on that note?

265 A: The note itself says to return to the Silver Palms employees  
266 who worked during Mr. Blake's investigation throughout 2023.  
267 That's referring to the employees listed in Exhibit 10.

268 Q: How did you decide who to speak to on this list?

269 A: I took the full roster of Silver Palms employees who worked  
270 shifts across 2023 and identified the ones I wanted to interview  
271 first, ranked by how frequently they'd worked that year.

272 Q: Is that the document marked Exhibit 17?

273 A: Yes.

274 Q: Is this note dated?

275 A: I guess it isn't. But I'm sure I wrote it before Ms. Calloway's  
276 testimony.

277 Q: Let's talk about how long interviewing everyone on that roster  
278 was expected to take. How many employees were on the full roster?

279 A: Around a hundred. Silver Palms is a large operation including  
280 event staff, food and beverage, housekeeping, front desk,  
281 groundskeeping, and everything else.

282 Q: And how long would it take to work through a list like that?

283 A: Months. We don't just speak to these witnesses for a few minutes  
284 and move on. Interviews generate follow-ups, records to pull, other  
285 people to talk to. Doing that across dozens of employees, with a  
286 team that was also carrying the rest of the Calloway investigation  
287 while the Donovan Team prepared for trial, that's a monthslong  
288 process, realistically.

289 Q: Hadn't some of these employees already been interviewed during  
290 the initial Donovan investigation?

291 A: Some had, yes. But that was in the Donovan investigation for  
292 murder.

293 Q: Why hadn't Kennedy Parker been interviewed earlier?

294 A: At that time, we had a tight case against Saint Donovan, and we  
295 had to make choices about where to spend our resources. Nothing at  
296 that point indicated Parker had information relevant to the Donovan  
297 prosecution.

298 Q: So, what changed?

299 A: We had far more questions than answers when it came to Emily  
300 Calloway. That meant spending much more time on the investigation  
301 into her involvement, including going back and interviewing  
302 employees we hadn't needed for the Donovan case.

303 Q: Was Kennedy Parker the first person on your list you  
304 interviewed?

305 A: No. In October, I interviewed Brie Collins, Sean Boothe, and  
306 Sunshine Delray, and Darnell Hahn before Kennedy Parker.

307 Q: Hadn't your office already interviewed three of those  
308 individuals?

309 A: Yes, we were performing investigative follow-up, but they didn't  
310 have anything new to add.

311 Q: Did Darnell Hahn?

312 A: He didn't have any recollection of interactions with external  
313 vendors or any interactions involving Mr. Blake.

314 Q: And when did you decide to interview Kennedy Parker?

315 A: The decision to go back to the 2023 employees, Parker among  
316 them, is the one documented in the note from late August.

317 Q: When did the Donovan trial begin?

318 A: October 7, 2024.

319 Q: And you're aware the Ms. Calloway did testify during that trial?

320 A: I'm aware Ms. Calloway was under court order to testify during  
321 the trial. That's all I know about her testimony.

322 Q: But you are aware that the Donovan trial was widely covered by  
323 news outlets in Gulf Haven?

324 A: Yes. But I didn't watch any of those stations.

325 Q: When did the Donovan trial end?

326 A: Donovan was convicted on October 24, 2024.

327 Q: When was Kennedy Parker actually interviewed?

328 A: October 31, 2024.

329 Q: After the wall off in August 2024, did you see AUSA Sinclair at  
330 all?

331 A: We grabbed lunch or a beer a couple of times, like we always  
332 have. But we never discussed the Silver Palms cases after August  
333 23, 2024.

334 Q: Describe what Kennedy Parker told you on October 31, 2024.

335 A: Parker described the confrontation at the Christmas party and  
336 witnessing part of the argument between Mr. Blake and Ms. Calloway.  
337 Parker said Parker went up to Ms. Calloway afterward to ask her  
338 what was going on and see if she was okay. Parker also told us  
339 that back in December of 2023, Ms. Calloway had asked Parker to  
340 move a file box marked "Coastal" out of the hotel to an off-site  
341 storage unit. Parker remembered the name and the location of the  
342 unit.

343 Q: Did you document Kennedy Parker's statement to you?

344 A: Yes. We had Parker fill out and sign a witness statement. I've  
345 provided that at Exhibit 18.

346 Q: Had the government known about that storage unit before Kennedy  
347 Parker told you?

348 A: No. That was the first anyone had heard of it. But Parker was  
349 on the list of employees I had already planned to come back to  
350 since August 2024. So, I would've found it one way or another.

351 Q: What did you do with the information Parker provided?

352 A: We confirmed that the storage unit existed and was rented under  
353 the name Carlos Calloway, as Parker described. We then obtained a  
354 search warrant, which we executed on November 5, 2024.

355 Q: What did you find?

356 A: Coastal records we had never recovered anywhere else: financial  
357 records, ownership documents, and communications. And one document  
358 in particular: an offshore banking record that identified Emily  
359 Calloway, by name, as the owner of the Cayman account that Coastal  
360 had been wiring money to for years.

361 Q: Are those the records in Exhibit 19?

362 A: An excerpt of them, yes. The full recovery was voluminous; the  
363 exhibit contains the ownership record and the proof of the funds  
364 wired to that account. I also took photos of the warehouse and box  
365 as we found it which are in Exhibit 20.

366 Q: Before Ms. Calloway's compelled testimony, did you personally  
367 regard Kennedy Parker as an important witness?

368 A: I regarded Parker as one of a large number of Silver Palms  
369 employees we needed to go back and interview for the broader  
370 investigation into Ms. Calloway. Like the other employees, I did  
371 not know if Parker would have any relevant information to add until  
372 I spoke to Parker.

373 Q: Did you, or anyone on Team Calloway, speak to Kennedy Parker  
374 before August 23, 2024?

375 A: No.

376 Q: After the warehouse search, what did you do?

377 A: The warehouse evidence, combined with the other evidence we'd  
378 collected, was presented to a grand jury. Emily Calloway was  
379 indicted on September 23, 2025 for homicide and money laundering.

380 *[Deposition adjourned.]*

381 I, Bryce Nolan, have read the foregoing deposition transcript and  
382 hereby affix my signature that the same is true and correct.

383 /s/ Bryce Nolan

1 EXCERPTS FROM THE DEPOSITION OF KENNEDY PARKER

2 KENNEDY PARKER, having first been duly sworn, testified as follows:

3 EXAMINATION BY COUNSEL FOR DEFENDANT:

4 Q: Would you state your name for the record.

5 A: Kennedy Parker. All-Region dancer and reigning champion of the  
6 Silver Palms Karaoke Night.

7 Q: What is it with you guys and karaoke?

8 A: Huh?

9 Q: Nevermind. What do you do for work, Kennedy?

10 A: So, my nine-to-five job is working as an events and banquet  
11 staff member at Silver Palms, been there since 2019. But if you're  
12 asking me what my true work is? I'm an energy assessor.

13 Q: What is an energy assessor?

14 A: It's very intuitive work. I'm a Pisces so I've always had that  
15 special gift of feeling the energy whenever I walk in a room. I  
16 have a client, she's a big celebrity so I can't say who, it's a  
17 whole NDA situation. All I'll say is that I've been drinking a lot  
18 of Megan Mango Protein Refreshers this summer. But whenever this  
19 celebrity is entering a new space, I go in first and I read the  
20 room. The energy. And then I report back. Is the room ready for  
21 her, is it not ready for her. It's very specialized.

22 Q: Have you held any other jobs while you've been employed at  
23 Silver Palms?

24 A: Okay, so let me see. I was a wellness consultant at a juice  
25 place, that was a season. Then I taught reformer Pilates. Then I  
26 was a vibe curator at a boutique hotel downtown, which is different  
27 from what I do now, that was more about candles and lighting. I  
28 started nursing school once but learned that was most definitely  
29 not for me. And then I was a brand ambassador for a hard seltzer.

30 Q: That's a lot of jobs.

31 A: Isn't that the whole point of job searching? You try multiple  
32 jobs, sometimes two jobs at the same time to know which one you  
33 like best.

34 Q: Let's stay focused on this case and your job at Silver Palms  
35 for now.

36 A: Absolutely. Focused. That's me. Go.

37 Q: Tell me a bit more about the Silver Palms job.

38 A: First, I mean how gorgeous right. Who wouldn't want to work  
39 there. It had great energy. They hired me to work weddings, galas,  
40 conferences, or any other event the resort hosted. I love it there.  
41 It's a beautiful property; my grandmother even got married at SP.  
42 That's what we call Silver Palms.

43 Q: What do events and banquet staff do, day to day?

44 A: Everything. Set up seminar rooms, run conference or event check-  
45 in, pass hors d'oeuvres, pour champagne, refold a napkin into a  
46 swan if a bride's mother is having a moment. We're like special  
47 concierges. It's our job to keep events running smoothly and keep  
48 people happy. Sorry, can I show you something? It's related.

49 Q: Sure.

50 A: [Witness demonstrates.] That's a split. I can drop into a full  
51 split basically anywhere, it's kind of my thing and it always makes  
52 the guests laugh. I actually have great social and spatial  
53 awareness. Which matters, I think, for what you're going to ask  
54 me.

55 Q: It might. Let's talk about the people you worked with. Did you  
56 know the owners of Silver Palms?

57 A: Everybody knew the owners. Ms. Calloway, Emily, she's the  
58 Calloway, her family's owned Silver Palms basically forever. And  
59 then Mr. Donovan, Saint, he came in as the co-owner a few years  
60 back. Business partner.

61 Q: Let's start with Ms. Calloway. What were your interactions with  
62 her like?

63 A: Emily was the best. Everybody loved her. She was the kind of  
64 boss who actually knew your name, asked about your life. She was  
65 the one who connected me with my celebrity client. She was great  
66 at her job too. Always around on the floor, at the events, checking  
67 on things herself. She wasn't the type to sit in an office. She  
68 was a people person, like me, and if something needed doing, she'd  
69 handle it, or she'd grab one of us to help. She ran the guest side  
70 of the resort, the events, and the staff. All of that.

71 Q: And Mr. Donovan?

72 A: Saint was different. You didn't really see Saint at events. He  
73 was more the money guy, the business side. He was all numbers and  
74 dealt with the contracts, vendors, all that. Boring. He'd walk the  
75 floor sometimes, real polished, always in a three-piece suit. He  
76 always said that Silver Palms should have the best, no matter the  
77 cost.

78 Q: Was he nice?

79 A: I guess he was friendly enough, but not the way Emily is.  
80 Honestly a lot of us weren't totally sure what Emily saw in Saint.  
81 We never really knew what Saint did all day. He was either in his  
82 office or in the resort's speakeasy talking to Sunshine.

83 Q: Did you know Daniel Blake?

84 A: A little. I knew Daniel was like the hotel accountant. He was  
85 quieter, didn't seem to have a lot of friends, and he kept to the  
86 back offices. He was the kind of person who always carried a folder  
87 or a tiny notebook like journalists use. And he always looked like  
88 he was in the middle of something. Nice guy though. Awful what  
89 happened to him. The energy in that hallway will never be the same.

90 Q: You mentioned Mr. Donovan handled vendors. In your work at  
91 events, did you ever encounter the resort's outside vendors?

92 A: Sure, all the time. Events run on vendors, florists, AV people,  
93 catering overflow when we were short. There were a few regulars.

94 Q: Was there a vendor called Coastal?

95 A: Coastal Event Solutions, yeah. They were one of the staffing  
96 and management ones. They'd send people to help work the bigger  
97 events sometimes. It kind of confused me that they were there.

98 Q: Why?

99 A: There were usually plenty of us from SP staffing the event.

100 Q: How often did you actually see Coastal people at events?

101 A: Not that often, now that I think about it. Like, sometimes? A  
102 big gala, a big conference, you might see a couple Coastal folks  
103 in the mix. But it wasn't every event, and it was never a lot of  
104 them.

105 Q: How did you know they were Coastal, specifically?

106 A: Because of Guy.

107 Q: Guy?

108 A: Yes, Guy. He was the Coastal guy. Their on site manager, or  
109 their point person, or whatever. But his actual name was Guy, which  
110 I thought was so funny, like, you're a guy named Guy. I may have  
111 had a small crush on him. A medium crush. Whatever. Anyways,  
112 whenever Coastal was there working an event, Guy was the one  
113 running their little crew.

114 Q: Tell me more about Guy.

115 A: Great forearms. Blonde. Tall, not aggressively tall but tall in  
116 like a considerate way. He always smelled woodsy, but not in a



117 gross way, and he had this energy that was so grounded, I knew  
118 immediately he was an earth sign.

119 Q: Kennedy, I mean tell me about what Guy did during the events at  
120 Silver Palms.

121 A: Oh, sorry. Guy would make sure his one or two employees knew  
122 where they needed to stand or what they needed to do and then he  
123 would always check in with Emily.

124 Q: He'd check in with Ms. Calloway how?

125 A: Whenever Guy and the Coastal people were there, at some point  
126 Ms. Calloway and Guy would talk. Off to the side, by the service  
127 entrance usually, talking over a clipboard, a phone, a file folder,  
128 whatever.

129 Q: You're certain it was Ms. Calloway and Guy having these  
130 conversations?

131 A: A hundred percent. I told you, I was watching Guy. When you  
132 have a crush on someone you know exactly where they are in a room  
133 at all times. That's just science.

134 Q: Did you ever hear what they talked about?

135 A: No, I was never close enough. It always looked like something  
136 that would be bad for my skin. Logistics-y, business-y stuff.

137 Q: I want to go back to what you did at Silver Palms. Did you ever  
138 perform any personal work for Ms. Calloway or Mr. Donovan outside  
139 of your usual event duties?

140 A: For Emily, sure. Not Saint, I barely talked to him. But Emily  
141 would have me do little things for her all the time.

142 Q: Like what?

143 A: Errands, mostly. Pick up an order, drop something at the front  
144 office, run a package over to the post office. Once she had me  
145 drive a centerpiece across town to a client who'd forgotten it.  
146 Little stuff. I didn't mind. It got me off the floor for a bit and  
147 she always said thank you.

148 Q: So, was it unusual for Ms. Calloway to ask you to run something  
149 to another location?

150 A: Not even a little. That was a normal Tuesday. She trusted me.

151 Q: Did anyone else know you were doing this extra work for Ms.  
152 Calloway?

153 A: No. She said to keep it to myself, so I did. Figured it was her  
154 business.

155 Q: Let's talk about December 10, 2023. Do you remember that day?

156 A: The staff Christmas party. Yes. The staff holiday party is a  
157 huge deal. It's the one night the resort hosts an event for the  
158 employees instead of the other way around. I wasn't officially  
159 working it, but Brie Collins, one of our managers, asked me to  
160 help with set up and drinks. I didn't mind though, it's a party,  
161 you know?

162 Q: Where was the staff party?

163 A: It was in the main ballroom, the big one that opens onto the  
164 terrace. Gorgeous. Twinkle lights, the whole thing.

165 Q: Who was at the party?

166 A: Pretty much all the staff were there. Events, kitchen,  
167 housekeeping, front desk, grounds . . . everybody. And Emily and  
168 Saint were making the rounds, they made a little toast, and just  
169 chatting with everyone.

170 Q: And what were you doing that night, specifically?

171 A: I was sort of half-working, half-attending. I'd done the garland  
172 on the west staircase myself, thank you very much. And I was  
173 floating with trays, champagne, mostly. We had three sparkling  
174 moments scheduled, I mean that literally, three toasts. So, I was  
175 in and out, ballroom to service hall, refilling, passing drinks.

176 Q: At some point in the evening, did you speak with Ms. Calloway?

177 A: Yea. I accidentally stumbled into an argument between her and  
178 Daniel.

179 Q: What did you see?

180 A: So, there's this little alcove by the coat check, kind of  
181 between the ballroom and the service hall. I was coming through  
182 with a tray, heading back to refill, and they were right there in  
183 the alcove. Daniel and Emily. And they were having a thing. A tense  
184 thing. I basically walked right into the middle of it before I  
185 realized.

186 Q: What did you see and hear?

187 A: I heard Daniel say, "You know there's a problem with the  
188 payments. I'm giving you one last chance to do the right thing."  
189 And then Emily said, "You're making a mistake. Back off Daniel."

190 Q: How certain are you of what you heard?

191 A: Oh that part I heard clear as anything because I was right  
192 there. The energy was off – way off. And I'm sensitive to that,

193 it's literally my job. But at the time I just thought, oh, work  
194 drama, everybody's stressed, it's December, the holidays make  
195 everyone crazy.

196 Q: How long did you see them arguing?

197 A: Just a few seconds, honestly. I kind of froze, then I did the  
198 thing where you pretend you didn't hear anything and I kept walking  
199 back towards the service hall. I saw them stop talking right after.

200 Q: Do you remember what time that was?

201 A: Not exactly, but it was between the second and third round of  
202 toasts. So, it must have been a little before 10 p.m.

203 Q: What did you do after that?

204 A: Once I saw Daniel leave the party, I went up to Emily, because  
205 I like her, she was always so nice to me and she was clearly upset.  
206 I said, "Hey, everything okay? What was that about?" Just checking  
207 in. And she kind of waived me off, said it was nothing, don't worry  
208 about it.

209 Q: At that time, did you know what the argument was about?

210 A: No idea. But it was clearly not fine, her energy field was  
211 totally misaligned. I only know what I heard though. I just figured  
212 it was, like, an accounting thing or whatever.

213 Q: Kennedy, what was it like at the resort after December 12th,  
214 after Mr. Blake died?

215 A: Oh, it was chaos. It was awful. You have to understand, Daniel  
216 got killed in the building, in his office. So first there's just  
217 this horror, everybody's shaken up, crying in the break room. And  
218 then for weeks it's police, police, police. Detectives in and out.  
219 They taped off part of the admin wing. They were pulling files,  
220 carrying out boxes and computers, taking Daniel's whole office  
221 apart.

222 Q: Did you see law enforcement interviewing employees?

223 A: Yeah, they set up in one of the conference rooms and they'd  
224 pull people in. Mostly the people who worked close to Daniel, the  
225 business office and operations side. Managers. People who were  
226 there that night Daniel died.

227 Q: Were you one of the people they spoke to?

228 A: No. Nobody ever pulled me in. I was banquet staff. I wasn't in  
229 the office; I wasn't there that night. I don't think I was on  
230 anybody's list. So, I just kind of hung back.

231 Q: Did you avoid law enforcement?

232 A: No, not per se. I would've talked to them if they asked me, but  
233 my job kept me busy and Emily had a lot of errands for me to run  
234 towards the end of the year, so I was out a lot. I figured the  
235 detectives were talking to the important people, the office people,  
236 and I was just the person passing champagne. It didn't occur to me  
237 that I knew anything they'd want to hear.

238 Q: Why didn't you tell the detectives about the argument you saw  
239 between Mr. Blake and Ms. Calloway?

240 A: I figured Emily would tell them everything they needed to know,  
241 I guess. She's a helpful person.

242 Q: But she was arguing with Mr. Blake two days before he was  
243 killed. That didn't strike you as odd?

244 A: No! There's no way Emily would do something like that.

245 Q: You said that Ms. Calloway was having you run a lot of errands  
246 towards the end of December. Did any of them stick out to you?

247 A: Let me think. She did send me to this really gross warehouse.

248 Q: When?

249 A: That was on December 20, 2023. I volunteered to work an extra  
250 shift because my celebrity client was off on vacation and I figured  
251 it would keep me busy. I was doing my normal stuff helping prepare  
252 for a conference we were hosting soon. And sometime that day, Emily  
253 asked me to run an errand.

254 Q: What errand?

255 A: It wasn't a big deal. She grabbed me near the offices and said,  
256 hey, can you take this box somewhere for me. And I said sure. Of  
257 course.

258 Q: Describe the box.

259 A: Weird, but okay. It was just a box. Like a file box. A banker's  
260 box. Whatever. It had a little lid. It wasn't heavy or anything  
261 and it said "Coastal" on the side, in blue marker.

262 Q: Did you look inside the box?

263 A: I didn't go digging or anything, of course. But did I maybe for  
264 a second think that Guy's phone number might be somewhere in there?  
265 I couldn't say. It just so happened that when I picked it up, the  
266 lid slid off a little, just for a second, and I saw some papers on  
267 top. One of them looked like it might've been from a bank. It had

268 columns with a bunch of large numbers and dates. But I only saw it  
269 for a second before I fixed the lid.

270 Q: You said it said "Coastal" on the side. Did that mean anything  
271 to you at the time?

272 A: Not really. I mean, I knew Coastal the vendor obviously. But I  
273 figured it was just, like, event files, vendor paperwork, or  
274 decoration related. We had a coastal-themed wedding once,  
275 driftwood everywhere, so it could've been about that.

276 Q: Where did Ms. Calloway tell you to take it?

277 A: She gave me an address and directions. It was a storage place  
278 off-site, one of those self-storage unit places, maybe fifteen  
279 minutes away, out past the highway. She told me the specific unit,  
280 and gave me the code for the gate, and the key to open the actual  
281 unit. I put the box in the unit, locked up, and came back to work.

282 Q: I'm showing you what's been marked as composite Exhibit 20. Do  
283 you recognize what's in these photos?

284 A: Yea. That's the warehouse I went to, the box, and the unit I  
285 put the box in.

286 Q: Do you remember whose name the unit was under?

287 A: I didn't see a name on the unit. I just assumed it was Emily's.

288 Q: Did you report the box to law enforcement?

289 A: No. Why would I? At the time it was nothing. A boss I liked  
290 asked me to drop off a box. She'd asked me to do stuff like that  
291 a hundred times before. I genuinely did not think about that box  
292 again for, like, ten months.

293 Q: When did you learn Mr. Donovan had been arrested?

294 A: Same time everybody did. It went through the staff like  
295 wildfire. Somebody's cousin knew somebody who heard, and then it  
296 was on the local news. Saint, arrested, for hiring someone to kill  
297 Daniel. We could not believe it. Saint? The whole resort was just  
298 stunned. That was our owner.

299 Q: Did the arrests change how you thought about that Christmas  
300 party argument or the box?

301 A: Honestly? No, which I know sounds insane now. But in my head it  
302 was Saint. Saint hired the guy. Saint got arrested first. Emily  
303 wasn't part of that story, I still don't really believe she might  
304 be.

305 Q: Did law enforcement ever contact you before October 2024?

306 A: No.

307 Q: Did you follow Mr. Donovan's trial?

308 A: No. I know, everyone assumes I would've been glued to it.  
309 But no. It's a lot, okay? It was sad and it was stressful and it  
310 was my workplace and my boss, and I just . . . I couldn't.

311 Q: So, to be clear, did you watch or read Ms. Calloway's testimony  
312 from that trial?

313 A: No. Never.

314 Q: When did you speak with law enforcement?

315 A: October 31, 2024. I remember because it was Halloween and I had  
316 a truly tragic costume situation happening. Then I get a call from  
317 a detective who wants to speak to me all of the sudden. I told  
318 them they would have to wait until I got my costume situation  
319 sorted. That came first.

320 Q: And you told them everything you've told me.

321 A: Everything. Guy, the argument, going up to Ms. Calloway, the  
322 box, the storage unit, all of it.

323 Q: Did you put any of that in writing?

324 A: They had me write a statement in my own words and sign it. I  
325 read it over first, because I'm not signing something I didn't  
326 say. It's the one you showed me, Exhibit 18. That's my signature,  
327 that's my handwriting, all of it's accurate.

328 Q: Is it hard for you to be here, testifying about Ms. Calloway?

329 A: Yeah. It is. She was so kind to me. I'm not here to sink her.  
330 I would never want to hurt Emily. I'm only here because I got asked  
331 questions under oath and I'm not going to lie. I have a personal  
332 brand and energy to protect, and lying is just wrong. But if  
333 there's a version of all this where none of what I said hurts her,  
334 that's the version I want. She was always a great boss to me.

335 Q: Thank you, Kennedy.

336 A: No, thank you. Truly.

337 *[Deposition adjourned.]*

338 I, Kennedy Parker, have read the foregoing deposition transcript  
339 and hereby affix my signature that the same is true and correct.

340 /s/ Kennedy Parker

1 DEPOSITION OF MADDOX ARMANA

2 MADDOX ARMANA, having first been duly sworn, testified as follows:

3 EXAMINATION BY COUNSEL FOR DEFENDANT:

4 Q: Please state your name for the record.

5 A: Maddox Armana.

6 Q: What do you do for a living?

7 A: I'm a licensed private investigator. I've had my own firm for  
8 about twelve years. Before that I spent nineteen years in law  
9 enforcement, and the last eight of those were as a detective  
10 working financial and organized crime cases.

11 Q: Why did you become a private investigator?

12 A: A crappy ex. I was with my partner for almost ten years when I  
13 found out they were cheating on me with a close friend, Rael. Rael  
14 was ten years younger than me and my ex couldn't resist. They even  
15 had the audacity to stay at our house together when I was out of  
16 town for work. That kind of mess will motivate you to make drastic  
17 changes in your life.

18 Q: What kind of work does your firm do now?

19 A: A lot of it is litigation support. I get hired by attorneys,  
20 mostly defense attorneys, some civil firms, to run down facts,  
21 witnesses, and evidence they need for a case that may not come up  
22 easily in discovery. I'm a lot better than attorneys at locating  
23 witnesses who don't want to be found. I interview them, pull and  
24 read related records, reconstruct timelines, that sort of thing.  
25 I'm not the lawyer. I'm the person who finds out what happened so  
26 the lawyer can decide what to do with it.

27 Q: When you're retained by an attorney for a case, who directs  
28 your work?

29 A: The attorney does. I work at their direction and under their  
30 supervision. What I find, the notes I take, the reports I write –  
31 that goes into the lawyer's case file. I'm an extension of the  
32 legal team, not a free agent.

33 Q: I want to direct your attention to early 2024. Were you retained  
34 by counsel for Ms. Emily Calloway?

35 A: I was. After Ms. Calloway's business partner, Saint Donovan,  
36 was arrested in January 2024, Ms. Calloway's attorneys brought me  
37 on. They suspected the government might come after Ms. Calloway  
38 too, and they wanted to be ready.

39 Q: What were you asked to do?

40 A: Broadly, to help counsel understand the financial structure the  
41 government was building a case around. That meant the companies,  
42 the money movement, who performed what work, and who really called  
43 the shots. Counsel wanted a deep understanding of that whole web  
44 in order to prepare a defense for Ms. Calloway if it came to that.  
45 My job was to develop and preserve those facts.

46 Q: And you were doing that specifically for Ms. Calloway's defense?

47 A: Yes. That's the only reason I was involved. Ms. Calloway's  
48 partner had just been arrested and charged, and her lawyers  
49 believed she could be next. Everything I did on that engagement,  
50 I did because counsel was preparing for that.

51 Q: In the course of that work, did you identify a person named  
52 Sierra Seton?

53 A: I did. I was going through the companies that came up in the  
54 Donovan case, specifically the outside vendors, and focusing on  
55 the people who had actually worked inside the companies, not just  
56 the names on the paperwork. Coastal Event Solutions was one of  
57 those companies. Sierra Seton came up as a former operations  
58 manager there.

59 Q: Why was Sierra Seton of interest to you?

60 A: Because Sierra was rare. Most of the names attached to these  
61 companies were people who couldn't be found, didn't exist, or  
62 weren't really that involved. Everything from registered agents to  
63 paper owners and dead ends. Sierra had worked on the inside of  
64 Coastal, in operations. Somebody who's been inside and is still  
65 reachable is your best source of information. So, Sierra went to  
66 the top of my list.

67 Q: Was Sierra Seton hard to find?

68 A: Yes. Very. Sierra was not interested in being found. There was  
69 no current address that was any good, no listed phone that worked,  
70 nothing that pointed at where Sierra actually was. This was  
71 somebody who had, deliberately or not, gone quiet.

72 Q: So how did you locate Sierra Seton?

73 A: The way I find people who don't want to be found. A lot of slow,  
74 unglamorous work. I pulled old records, ran down former addresses,  
75 talked to people connected to Sierra's past, including old  
76 coworkers, an old landlord, that kind of thing. I built out a  
77 picture of Sierra's life and worked it until her current location  
78 shook loose. It took real time and real effort. This wasn't a name  
79 I typed into a database and got a hit. I had to work at it.



80 Q: Where did you ultimately find Sierra Seton?

81 A: A small apartment in a coastal town a few hours from Gulf Haven.  
82 The kind of place somebody goes when they'd rather not be found.  
83 Modest, out of the way. Sierra was living quietly.

84 Q: What was your thought process going into the interview? What  
85 did you want to accomplish?

86 A: I went in wanting to understand Coastal from the inside; how it  
87 ran, versus how it looked on paper. I had a picture built from  
88 records, but records only take you so far. I needed a human being  
89 who'd been in the building. My goal was to sit Sierra down, get  
90 Sierra comfortable, and get as complete an account as I could of  
91 how that company really worked and who was behind it. I also went  
92 in knowing I might only get one shot, so I wanted to cover as much  
93 ground as possible in a single sitting.

94 Q: Why did you think you might only get one shot?

95 A: Because that's how it goes with a reluctant witness. Someone  
96 who's gone quiet and doesn't want to be found, you catch them once,  
97 if you're lucky, and you make it count. I've been doing this thirty  
98 years. You don't assume there'll be a second conversation. There  
99 usually isn't.

100 Q: Was anyone else present during the interview?

101 A: No. Just Sierra and me.

102 Q: How would you describe Sierra Seton's demeanor during the  
103 interview?

104 A: Guarded at first. Nervous, even. Sierra clearly had reservations  
105 about talking to me at all, and there were things Sierra was  
106 careful about. I could see Sierra choosing her words, deciding how  
107 much to say. But once we got going, Sierra opened up more than I  
108 expected. My read was that Sierra had been carrying this around  
109 for a while and there was some relief in finally telling somebody.  
110 Still careful, but forthcoming, if that combination makes sense.

111 Q: Did you audio or video record the interview?

112 A: I meant to. My recorder died right as we sat down. Dead  
113 batteries, my own fault. So, no recording.

114 Q: Why not come back later when you had working equipment?

115 A: Same reason I just gave. I'm never guaranteed to find a witness  
116 twice, and Sierra was exactly the kind of witness who might not be  
117 there the next time I came looking. I wasn't going to walk out on  
118 the one conversation I'd worked that hard to get because of a  
119 battery. I took the opportunity in front of me.

120 Q: Did you take notes during that interview?

121 A: I did. Contemporaneous typewritten notes, the way I always do.  
122 I write down what the witness tells me as they tell me, and I also  
123 jot my own thoughts as I go. Things like what I want to follow up  
124 on, things that strike me, questions forming in my head.

125 Q: Generally, and without saying specifically what Sierra told  
126 you, what subjects did the interview cover?

127 A: Generally, Sierra spoke about how Coastal actually operated,  
128 the people connected to the company, and how the money moved.

129 Q: Without reciting the specific contents, were Sierra Seton's  
130 factual observations detailed?

131 A: Very. This was a substantive interview with someone who had  
132 been on the inside. Sierra gave real, specific, factual  
133 information in those notes about how that company worked and who  
134 ran it.

135 Q: I'm showing you what's been marked and filed under seal as  
136 Exhibit 21. Do you recognize it?

137 A: I do. Those are my notes from the Sierra Seton interview.

138 Q: And those notes include both what Sierra told you and your own  
139 annotations?

140 A: Yes. The body is the factual account as Sierra gave it to me.  
141 The text in red is where you can see my own thoughts, follow-ups,  
142 questions, and the theories I was starting to form while I  
143 listened. That's how I take every set of notes.

144 Q: Let's turn to what happened to Sierra Seton after your  
145 interview. Do you know where Sierra is now?

146 A: No. Not long after I interviewed Sierra in February 2024, Sierra  
147 left the country, along with Ky Chandler, the man listed as  
148 Coastal's registered agent. The last anyone placed them was off  
149 the coast of Spain. Neither has surfaced since.

150 Q: What have you done to try to find Sierra Seton since then?

151 A: A lot. I've run Sierra's name through the databases I have  
152 access to, repeatedly, looking for any new address, any financial  
153 activity, any hit at all. I reached back out to the people I'd  
154 talked to when I found Sierra the first time, but nobody's heard  
155 from Sierra. I looked into the travel out of the country, tried to  
156 trace where they landed after Spain, but the trail goes cold. I've  
157 checked for any return to the country. Nothing. I've kept the file  
158 open and I still check periodically. As far as I can determine,  
159 Sierra is gone and unreachable.

160 Q: Is there anyone else who can provide what Sierra told you?

161 A: Not that I've found. Sierra was the one insider who'd worked in  
162 that company and would talk. Chandler is gone with Sierra. The  
163 other names around Coastal are dead ends.

164 Q: Are you aware of any other source that contains the same  
165 information you learned from Sierra Seton?

166 A: No. Not all of it, and not with the specific detail Sierra gave  
167 me about how Coastal actually operated. As far as I know, my notes  
168 are the only place that account still exists.

169 Q: Thank you.

170 A: Of course.

171 *[Deposition adjourned.]*

172 I, Maddox Armana, have read the foregoing deposition transcript  
173 and hereby affix my signature that the same is true and correct.

174 /s/ Maddox Armana

# EMERALD COAST CONSULTING, LLC

VENDOR & EVENT STAFFING MANAGEMENT

118 Harborview Causeway, Suite 4

Gulf Haven, FL 32659

(850) 555-0148 · billing@emeraldcoastconsulting.com

EIN 84-1187654

EXHIBIT 1A

## INVOICE

Invoice No. **EC-2023-0012**  
Invoice Date **January 14, 2023**  
Service Period **January 7-9, 2023**  
Terms **Net 15**

*Coastal's \$7300-"guest services & logistics," no detail. Tidewater on here too, same vague kind of line. Both newer vendors. Looked fine in January; not so sure now).  
-D.B. 4/3/23*

### BILL TO

Silver Palms Hospitality, LLC  
Attn: Accounts Payable  
2200 Shoreline Drive  
Gulf Haven, FL 32658

**Re: New Year's Eve Gala & Corporate Retreat (Silver Palms Conference Wing & Event Lawn)**

| DESCRIPTION                 | QTY / DETAIL                 | RATE | AMOUNT             |
|-----------------------------|------------------------------|------|--------------------|
| Equipment & AV Setup/Strike | Spring Conference, 3 days    | Flat | \$9,000.00         |
| Event Staffing Coordination | Conference Wing, 2 ballrooms | Flat | \$6,200.00         |
| Guest Services Support      | 1 event                      | Flat | \$2,400.00         |
| Subtotal                    |                              |      | \$17,600.00        |
| Vendor Mgmt.Fee (12%)       |                              |      | \$2,112.00         |
| <b>Total Due</b>            |                              |      | <b>\$19,712.00</b> |

### Attachment A — Subcontractor Allocation Schedule

Provided for client reconciliation purposes. Reflects Emerald's internal allocation of the above lump-sum charges among subcontracted vendors for the service period identified above.

| VENDOR                              | SCOPE                              | PERSONNEL/UNITS         | ALLOCATION         |
|-------------------------------------|------------------------------------|-------------------------|--------------------|
| Bayview Furniture & Decor Rentals   | Seating, staging, decor install    | Rental + 4 install crew | \$4,200.00         |
| Coastal Event Solutions, LLC        | Guest services & logistics support | 10 staff, 3 days        | \$7,300.00         |
| Tidewater Hospitality Partners, LLC | Supplemental staffing support      | Not itemized            | \$3,100.00         |
| Harbor Sound & AV                   | AV technicians, equipment          | 2 technicians           | \$3,000.00         |
| <b>Total allocated</b>              |                                    |                         | <b>\$17,600.00</b> |

Remit payment to Emerald Coast Consulting, LLC · Gulf Coast National Bank, Acct. ending 4417 · Questions regarding this invoice should be directed to Emerald's billing department at the number above. This invoice and its attachments are provided for Silver Palms Hospitality, LLC's internal accounting records. Case File\_048

# EMERALD COAST CONSULTING, LLC

VENDOR & EVENT STAFFING MANAGEMENT

118 Harborview Causeway, Suite 4

Gulf Haven, FL 32659

(850) 555-0148 · billing@emeraldcoastconsulting.com

EIN 84-1187654

EXHIBIT 1B

## INVOICE

Invoice No. **EC-2023-0045**  
Invoice Date **February 20, 2023**  
Service Period **February 11-14, 2023**  
Terms **Net 15**

*Coastal \$8,900, "special event support," nothing broken out - and Seagrove same way. Compare Bayview on this invoice, fully itemized. These newer vendors never are.  
-D.B. 4/5/23*

### BILL TO

Silver Palms Hospitality, LLC  
Attn: Accounts Payable  
2200 Shoreline Drive  
Gulf Haven, FL 32658

**Re: Valentine's Couples Weekend Package (Silver Palms Resort)**

| DESCRIPTION                   | QTY / DETAIL                    | RATE | AMOUNT             |
|-------------------------------|---------------------------------|------|--------------------|
| Weekend Package Event Support | Couple's weekend, all-inclusive | Flat | \$11,600.00        |
| Floral & Decor Coordination   | Valentine's weekend             | Flat | \$6,250.00         |
| Subtotal                      |                                 |      | \$17,850.00        |
| Vendor Mgmt.Fee (12%)         |                                 |      | \$2,142.00         |
| <b>Total Due</b>              |                                 |      | <b>\$19,992.00</b> |

### Attachment A — Subcontractor Allocation Schedule

Provided for client reconciliation purposes. Reflects Emerald's internal allocation of the above lump-sum charges among subcontracted vendors for the service period identified above.

| VENDOR                            | SCOPE                                   | PERSONNEL/UNITS | ALLOCATION         |
|-----------------------------------|-----------------------------------------|-----------------|--------------------|
| Coastal Event Solutions, LLC      | Special event support (couples weekend) | Not itemized    | \$8,900.00         |
| Seagrove Staffing Group, LLC      | Event staffing support                  | Not itemized    | \$3,400.00         |
| Bayview Furniture & Decor Rentals | Floral & decor install                  | 1 event         | \$5,550.00         |
| <b>Total allocated</b>            |                                         |                 | <b>\$17,850.00</b> |

Remit payment to Emerald Coast Consulting, LLC · Gulf Coast National Bank, Acct. ending 4417 · Questions regarding this invoice should be directed to Emerald's billing department at the number above. This invoice and its attachments are provided for Silver Palms Hospitality, LLC's internal accounting records. Case File\_049

# EMERALD COAST CONSULTING, LLC

VENDOR & EVENT STAFFING MANAGEMENT

118 Harborview Causeway, Suite 4

Gulf Haven, FL 32659

(850) 555-0148 · billing@emeraldcoastconsulting.com

EIN 84-1187654

## INVOICE

Invoice No. **EC-2023-0078**

Invoice Date **March 22, 2023**

Service Period **March 15-18, 2023**

Terms **Net 15**

Coastal \$19,800 - well over half the invoice, "general event support." Dune & Palm on here too, same vague style. That's all four of the newer vendors now, same pattern. Asking Emily this week.  
-D.B. 4/8/23

EXHIBIT 1C

### BILL TO

Silver Palms Hospitality, LLC

Attn: Accounts Payable

2200 Shoreline Drive

Gulf Haven, FL 32658

**Re: Spring Industry Conference (Silver Palms Conference Wing, Ballrooms A & B)**

| DESCRIPTION                   | QTY / DETAIL                 | RATE | AMOUNT             |
|-------------------------------|------------------------------|------|--------------------|
| Multi-Day Conference Support  | Spring Conference, 3 days    | Flat | \$24,700.00        |
| Equipment, Staging & AV       | Conference Wing, 2 ballrooms | Flat | \$6,900.00         |
| Registration & Guest Services | 1 event                      | Flat | \$6,700.00         |
| Subtotal                      |                              |      | \$38,300.00        |
| Vendor Mgmt.Fee (12%)         |                              |      | \$4,596.00         |
| <b>Total Due</b>              |                              |      | <b>\$42,896.00</b> |

### Attachment A — Subcontractor Allocation Schedule

Provided for client reconciliation purposes. Reflects Emerald's internal allocation of the above lump-sum charges among subcontracted vendors for the service period identified above.

| VENDOR                            | SCOPE                             | PERSONNEL/UNITS  | ALLOCATION         |
|-----------------------------------|-----------------------------------|------------------|--------------------|
| Coastal Event Solutions, LLC      | General event support & logistics | 3-day conference | \$19,800.00        |
| Dune & Palm Logistics, LLC        | Logistics & support               | Not itemized     | \$3,600.00         |
| Bayview Furniture & Decor Rentals | Staging, seating                  | 1 event          | \$8,200.00         |
| Harbor Sound & AV                 | AV technicians, equipment         | 3 technicians    | \$6,700.00         |
| <b>Total allocated</b>            |                                   |                  | <b>\$38,300.00</b> |

Remit payment to Emerald Coast Consulting, LLC · Gulf Coast National Bank, Acct. ending 4417 · Questions regarding this invoice should be directed to Emerald's billing department at the number above. This invoice and its attachments are provided for Silver Palms Hospitality, LLC's internal accounting records. Case File\_050

# SILVER PALMS HOSPITALITY, LLC

PROPERTY OPERATIONS · HUMAN RESOURCES

2200 Shoreline Drive, Gulf Haven, FL 32658 · (850) 555-0177

## Event Staffing Schedule — Excerpts

Scheduled Silver Palms employees by role, for the three event windows referenced in Emerald Coast Consulting invoices EC-2023-0012, EC-2023-0045, and EC-2023-0078 (Exhibits 1A–1C).

### January 7–9, 2023 — New Year's Eve Gala & Corporate Retreat (Inv. EC-2023-0012)

| Role / Assignment                         | Scheduled | Notes                                 |
|-------------------------------------------|-----------|---------------------------------------|
| Event / Banquet Staff                     | 8         | Ballroom & lawn setup, floor coverage |
| Servers / Waitstaff                       | 10        | Retreat meals, gala dinner service    |
| Bartenders                                | 4         | Gala, both bars                       |
| AV / Media Support                        | 2         | In-house AV, retreat sessions         |
| Guest Services / Concierge                | 3         | Retreat check-in, gala welcome        |
| Housekeeping (Turnover)                   | 5         | Room & event-space turnover           |
| <b>Total Silver Palms staff scheduled</b> | <b>32</b> |                                       |

**Coastal Event Solutions billed \$7,300** for “guest services & logistics support, 10 staff, 3 days” — the same categories of work already covered above by scheduled Silver Palms staff.

### February 11–14, 2023 — Valentine's Couples Weekend Package (Inv. EC-2023-0045)

| Role / Assignment                         | Scheduled | Notes                                   |
|-------------------------------------------|-----------|-----------------------------------------|
| Event Staff                               | 4         | Beach Club setup, weekend coverage      |
| Servers / Waitstaff                       | 6         | Restaurant & in-room dining, weekend    |
| Bartenders                                | 2         | Beach Club bar                          |
| Guest Services / Concierge                | 3         | Package check-in, turndown coordination |
| Housekeeping (Turnover)                   | 4         | Room turnover, weekend                  |
| <b>Total Silver Palms staff scheduled</b> | <b>19</b> |                                         |

**Coastal Event Solutions billed \$8,900** for “special event support (couples weekend)” — personnel/units not itemized on the invoice. No corresponding gap in Silver Palms’ own weekend coverage above.

### March 15–18, 2023 — Spring Industry Conference (Inv. EC-2023-0078)

| Role / Assignment                         | Scheduled | Notes                              |
|-------------------------------------------|-----------|------------------------------------|
| Event / Conference Staff                  | 12        | Ballroom A&B setup, floor coverage |
| Servers / Waitstaff                       | 14        | Conference meals, receptions       |
| Bartenders                                | 4         | Evening receptions                 |
| AV / Media Support                        | 3         | In-house AV, general sessions      |
| Registration / Guest Services             | 5         | Check-in, attendee support         |
| Housekeeping (Turnover)                   | 6         | Conference wing turnover, 3 days   |
| <b>Total Silver Palms staff scheduled</b> | <b>44</b> |                                    |

**Coastal Event Solutions billed \$19,800** for “general event support & logistics, 3-day conference” — again the same categories (event staff, waitstaff, registration/guest services) already scheduled and covered by Silver Palms employees above.

**March 15–18, 2023 — Event / Conference Staff, named (attached to reconciliation)**

Individual Event / Conference staff scheduled for the Spring Industry Conference, per Property Operations sign-in. Compiled with the role summary above.

|   | Employee (Last, First) | Role / Assignment        |
|---|------------------------|--------------------------|
| * | Collins, Brie          | Event Lead               |
|   | Frost, Wanda           | Registration / Guest Svc |
| * | Parker, Kennedy        | Event / Banquet          |
|   | Dalton, Camila         | Server / Waitstaff       |
| * | Kirby, Maria           | Event / Banquet          |
|   | Hancock, Rosa          | Registration / Guest Svc |
| * | Lang, Rachel           | Event / Banquet          |
|   | Gentry, Elena          | Server / Waitstaff       |
| * | Nash, Delia            | Server / Waitstaff       |
|   | Esposito, Nadia        | Registration / Guest Svc |
| * | Hahn, Darnell          | Server / Waitstaff       |
|   | Fields, Elena          | Registration / Guest Svc |

Note: this schedule reflects Silver Palms' own regularly employed and per-diem staff, drawn from the property's standing event, food & beverage, guest services, and housekeeping departments. It does not itself establish that Coastal Event Solutions performed no work for these events, only that Silver Palms did not appear, from these records, to be short-staffed in the categories Coastal's invoices describe.

Compiled by D. Blake, Accounting — April 2023



## STATE OF FLORIDA — SECRETARY OF STATE

DIVISION OF CORPORATIONS · CERTIFIED ENTITY RECORDS

The following are certified excerpts of business-entity registration records maintained by the Secretary of State, produced in the ordinary course. Entity formation dates and registered agents shown as filed.

**EMERALD COAST CONSULTING, LLC****ACTIVE**

|                                          |                                                                        |
|------------------------------------------|------------------------------------------------------------------------|
| DOCUMENT NO.<br><b>L18-0009281</b>       | DATE FILED / FORMED<br><b>September 28, 2018</b>                       |
| REGISTERED AGENT<br><b>Saint Donovan</b> | PRINCIPAL ADDRESS<br><b>118 Harborview Causeway, Ste 4, Gulf Haven</b> |
| MANAGING MEMBER<br><b>Saint Donovan</b>  | PURPOSE<br><b>Vendor &amp; event staffing management</b>               |

**COASTAL EVENT SOLUTIONS, LLC****ACTIVE**

|                                        |                                                               |
|----------------------------------------|---------------------------------------------------------------|
| DOCUMENT NO.<br><b>L18-0009944</b>     | DATE FILED / FORMED<br><b>October 12, 2018</b>                |
| REGISTERED AGENT<br><b>Ky Chandler</b> | PRINCIPAL ADDRESS<br><b>4400 Marsh Landing Rd, Gulf Haven</b> |
| MEMBER / OWNER<br><b>Ky Chandler</b>   | PURPOSE<br><b>Event support services</b>                      |

**TIDEWATER HOSPITALITY PARTNERS, LLC****ACTIVE**

|                                        |                                                                               |
|----------------------------------------|-------------------------------------------------------------------------------|
| DOCUMENT NO.<br><b>L18-0009951</b>     | DATE FILED / FORMED<br><b>October 12, 2018</b>                                |
| REGISTERED AGENT<br><b>Ky Chandler</b> | PRINCIPAL ADDRESS<br><b>2215 Beacon Harbor Way, Ste 300,<br/>Jacksonville</b> |
| MEMBER / OWNER<br><b>Ky Chandler</b>   | PURPOSE<br><b>Hospitality consulting</b>                                      |

**SEAGROVE STAFFING GROUP, LLC****ACTIVE**

|                                        |                                                          |
|----------------------------------------|----------------------------------------------------------|
| DOCUMENT NO.<br><b>L18-0009958</b>     | DATE FILED / FORMED<br><b>October 13, 2018</b>           |
| REGISTERED AGENT<br><b>Ky Chandler</b> | PRINCIPAL ADDRESS<br><b>870 Ashford Oaks Blvd, Tampa</b> |
| MEMBER / OWNER<br><b>Ky Chandler</b>   | PURPOSE<br><b>Temporary staffing</b>                     |

**DUNE & PALM LOGISTICS, LLC****ACTIVE**

|                                        |                                                         |
|----------------------------------------|---------------------------------------------------------|
| DOCUMENT NO.<br><b>L18-0009969</b>     | DATE FILED / FORMED<br><b>October 16, 2018</b>          |
| REGISTERED AGENT<br><b>Ky Chandler</b> | PRINCIPAL ADDRESS<br><b>140 Cypress Bend Dr, Mobile</b> |
| <b>Ky Chandler</b>                     | PURPOSE<br><b>Logistics &amp; materials handling</b>    |



EXHIBIT 3A





EXHIBIT 3B





EXHIBIT 4



# Silver Palms Hospitality, LLC

## Vendor Payment Review — Working File Index

Prepared by: D. Blake W/P Ref: VR-INDEX

Engagement: FY2023 vendor charges Period: Jan-Dec 2023

| REF.       | DESCRIPTION / CONTENTS                                     | NOTES                       |
|------------|------------------------------------------------------------|-----------------------------|
| <b>C-1</b> | Emerald — monthly bulk invoices, 2023 (Jan-Nov)            | <i>tied to G/L</i>          |
| <b>C-2</b> | Emerald — vendor allocation / payee breakdowns             | <i>recomputed</i>           |
| <b>C-3</b> | Coastal Event Solutions — event invoices, Q1-Q3 2023       | <i>submitted</i>            |
| <b>C-4</b> | Staffing logs — SP scheduled crews vs. billed vendor crews | <i>submitted</i>            |
| <b>C-5</b> | Coastal — site visit memo (4400 Marsh Landing)             | <i>vacant</i>               |
| <b>C-6</b> | Comparatives — Tidewater / Seagrove / Dune & Palm          | <i>cross-ref</i>            |
| <b>C-7</b> | Payroll exceptions — names not matching event shifts       | <i>flagged</i>              |
| <b>C-8</b> | Outbound routing — Coastal funds out of domestic acct      | <i>offshore — Caymans</i>   |
| <b>C-9</b> | <u>Coastal — beneficial owner of Cayman account</u>        | <i>confirmed this is it</i> |

*put it all together  
for Tatum - bring it Monday.*



**Emerald Coast Consulting, LLC — Check No. 1042**

Records returned January 25, 2024.

Front (top) and endorsement/deposit stamp (bottom) reproduced as recovered.

**ORIGINAL • NON-NEGOTIABLE COPY**

|                                                                                                  |                                                        |                 |
|--------------------------------------------------------------------------------------------------|--------------------------------------------------------|-----------------|
| <b>EMERALD COAST CONSULTING, LLC</b><br>118 Harborview Causeway, Suite 4<br>Gulf Haven, FL 32659 |                                                        | <b>No. 1042</b> |
| Date: <u>December 11, 2023</u>                                                                   |                                                        |                 |
| PAY TO THE<br>ORDER OF <u>Cash</u>                                                               | <b>\$15,000.00</b>                                     |                 |
| <u>Fifteen thousand and 00/100</u>                                                               |                                                        | DOLLARS         |
| <b>GULF COAST NATIONAL BANK</b><br>Gulf Haven Branch • Acct. ending 4417                         |                                                        |                 |
| Memo <u>maintenance work</u>                                                                     | <u>Saint Donovan</u><br>Saint Donovan, Managing Member |                 |
| ⑈ 104200456 ⑈ 441711029 ⑈ 1042                                                                   |                                                        |                 |

Front of check, as imaged by depositing bank and produced in response to subpoena.

**Endorsement & Deposit — Reverse of Check**

|                                                                                        |                                    |
|----------------------------------------------------------------------------------------|------------------------------------|
| <b>Endorsement area —<br/>signature partially<br/>illegible on<br/>recovered image</b> | <b>FOR DEPOSIT ONLY</b>            |
| <u>Saint Donovan</u><br>MP                                                             | Coastal Trust Bank • Acct ****8821 |
|                                                                                        | Deposited 12/13/2023               |

Endorsement/deposit stamp as imaged by depositing bank and produced in response to subpoena.

Subscriber: Saint Donovan · MDN (redacted) · Acct # (redacted)

CALL DETAIL RECORDS (EXCERPT)

| DATE       | TIME     | DIRECTION | OTHER PARTY                    | DURATION |
|------------|----------|-----------|--------------------------------|----------|
| 12/10/2023 | 11:47 PM | Incoming  | Emily Calloway (cell)          | 5:02     |
| 12/11/2023 | 12:14 AM | Outgoing  | (redacted - see homicide file) | 1:07     |

Records maintained by Meridian Wireless in the ordinary course of business and produced under subpoena following the arrest of the subscriber. Certain identifiers [REDACTED] consistent with the related homicide file. Page 1 of 2 — Call Detail Records.

Text Message (SMS) Extract

Recovered message associated with the subscriber device · December 10-11, 2023

MESSAGE DETAIL RECORDS (EXCERPT)

| DATE       | TIME     | DIRECTION      | OTHER PARTY           | MESSAGE CONTENT |
|------------|----------|----------------|-----------------------|-----------------|
| 12/10/2023 | 11:53 PM | Incoming (SMS) | Emily Calloway (cell) | "Handle it."    |

Message extracted from Saint Donovan's device; message from Emily Calloway shown as received. The "Handle it" message was received from the number subscribed to Emily Calloway at 11:53 PM, approximately six minutes after the 11:47 PM voice call ended. No other message content for this period was recoverable from the device.



# GULF COAST NATIONAL BANK

COMMERCIAL ACCOUNT RECORDS – PRODUCED PURSUANT TO SUBPOENA

Records Produced: **February 1, 2024**

Custodian of Records certified period :  
**Jan 1 - Dec 31, 2023**

**EMERALD COAST CONSULTING, LLC – Business Checking Acct. ending 4417**

**Signatory: Saint Donovan, Managing Member | 118 Harborview Causeway, Ste 4, Gulf Haven, FL**

## Year-End Account Activity Summary – Calendar Year 2023

*Prepared from account records for the period January 1 through December 31, 2023. This summary reflects total funds received into the account from Silver Palms Hospitality, LLC during 2023, and total payments made from the account to each principal payee during the same period. Individual transactions are aggregated by payee; per-transaction detail was produced separately.*

| SOURCE                        | DESCRIPTION                                          | AMOUNT                |
|-------------------------------|------------------------------------------------------|-----------------------|
| Silver Palms Hospitality, LLC | Recurring monthly ACH credits –<br>“vendor services” | \$5,459,900.00        |
| <b>Total received, 2023</b>   |                                                      | <b>\$5,459,900.00</b> |

### PAYMENTS MADE, BY PAYEE – CALENDAR YEAR 2023 (PRINCIPAL PAYEES)

| PAYEE                                      | ENTITY FORMED   | TOTAL PAID, 2023      |
|--------------------------------------------|-----------------|-----------------------|
| <b>Coastal Event Solutions, LLC</b>        | <b>Oct 2018</b> | <b>\$2,238,900.00</b> |
| <b>Tidewater Hospitality Partners, LLC</b> | <b>Oct 2018</b> | <b>\$1,120,000.00</b> |
| <b>Seagrove Staffing Group, LLC</b>        | <b>Oct 2018</b> | <b>\$845,000.00</b>   |
| <b>Dune &amp; Palm Logistics, LLC</b>      | <b>Oct 2018</b> | <b>\$690,000.00</b>   |
| Bayview Furniture & Decor Rentals          | 2011            | \$268,000.00          |
| Harbor Sound & AV                          | 2012            | \$141,000.00          |
| All other operating distributions          | _____           | \$95,400.00           |
| <b>Total payments made, 2023</b>           |                 | <b>\$5,398,300.00</b> |

*Records maintained by Gulf Coast National Bank in the ordinary course of business and produced under subpoena dated January 28, 2024. This is a year-end summary of account activity from 2023, aggregated by payee; full per-transaction detail produced separately. Certain account numbers redacted for privacy.*

EXHIBIT 8

Case File\_061

# GULF COAST NATIONAL BANK

Records Produced: **February 12, 2024**

COMMERCIAL ACCOUNT RECORDS – PRODUCED PURSUANT TO SUBPOENA

Custodian of Records certified  
Statement excerpt: 2018-2023  
(summary)

## COASTAL EVENT SOLUTIONS, LLC – Business Checking Acct. ending 8106

Registered owner / signatory of record: Ky Chandler - 4400 Marsh Landing Rd (vacant suite), Gulf Haven, FL

### Account Activity Summary – 2018 through 2023

Prepared from account records for the period 2018 through 2023. This summary reflects total funds received into the account from Emerald Coast Consulting by year, and total payments out of the account by category over the same period, including the offshore wire transfers detailed below. Individual transactions are aggregated; per-transaction detail was produced separately.

| YEAR                             | DEPOSITS FROM EMERALD  | NOTES                     |
|----------------------------------|------------------------|---------------------------|
| 2018 (partial)                   | \$318,000.00           | from Oct 2018 (formation) |
| 2019                             | \$1,846,500.00         |                           |
| 2020                             | \$2,104,900.00         |                           |
| 2021                             | \$1,690,300.00         |                           |
| 2022                             | \$2,251,700.00         |                           |
| 2023                             | \$2,238,900.00         |                           |
| <b>Total received, 2018-2023</b> | <b>\$10,450,300.00</b> |                           |

### MONEY OUT - SELECTED

| CATEGORY                                         | AMOUNT (2018-2023)    | NOTES                                |
|--------------------------------------------------|-----------------------|--------------------------------------|
| Payroll (real employees)                         | \$1,690,000.00        | incl. S. Seton, ops mgr              |
| Equipment, supplies, legit vendors               | \$940,000.00          | genuine event costs                  |
| <b>Wire transfers - offshore (see below)</b>     | <b>\$7,100,000.00</b> | <b>19 transfers, quarterly</b>       |
| Operating / misc.                                | \$620,000.00          |                                      |
| <b>Payments to owner of record (Ky Chandler)</b> | <b>\$0.00</b>         | <b>none - no salary distribution</b> |

### OFFSHORE WIRE TRANSFERS (DETAIL)

| DATE       | BENEFICIARY         | DESTINATION    | AMOUNT       |
|------------|---------------------|----------------|--------------|
| 03/15/2019 | Marsh Holdings Ltd. | Cayman Islands | \$312,000.00 |
| 06/14/2019 | Marsh Holdings Ltd. | Cayman Islands | \$358,500.00 |
| 09/13/2019 | Marsh Holdings Ltd. | Cayman Islands | \$341,900.00 |
| ...        | Marsh Holdings Ltd. | Cayman Islands | ...          |
| 12/09/2023 | Marsh Holdings Ltd. | Cayman Islands | \$402,200.00 |

**19 transfers, 2019-2023, to a single Cayman account**

**\$7,100,000.00**

Records maintained by Gulf Coast National Bank in the ordinary course of business and produced under subpoena. Summary figures compiled from produced account statements; underlying statements produced separately.

EXHIBIT 9

Case File\_062

# SILVER PALMS HOSPITALITY, LLC

## Human Resources — Employee Roster (Records Export)

Personnel active at any point January 2019 – December 2023 · Sorted by surname · Produced in the ordinary course and maintained in HR records since export. Fields: No. · Employee (Last, First) · Department · Hire date · Separation date ("present" = still employed as of export).

| #  | Employee           | Dept.                 | Hired    | End      | #   | Employee           | Dept.                 | Hired    | End      |
|----|--------------------|-----------------------|----------|----------|-----|--------------------|-----------------------|----------|----------|
| 1  | Abbott, Chad       | Accounting            | Jul 2022 | present  | 51  | Lowery, Val        | Culinary              | Aug 2019 | Aug 2021 |
| 2  | Abbott, Damon      | Front Desk            | Jun 2022 | present  | 52  | Merrick, Wanda     | Beach Club            | Jan 2019 | Jan 2023 |
| 3  | Achebe, Niall      | Events                | Dec 2020 | Jun 2021 | 53  | Mancini, Carlos    | Accounting            | Feb 2020 | present  |
| 4  | Barnes, Wesley     | Grounds & Landscaping | Jan 2019 | present  | 54  | Mancini, Harold    | Grounds Security      | Jul 2021 | Aug 2023 |
| 5  | Bell, Terry        | Housekeeping          | Jan 2021 | Feb 2023 | 55  | Mancini, Nia       | Grounds Security      | Dec 2019 | present  |
| 6  | Blake, Daniel      | Accounting            | Jan 2023 | Dec 2023 | 56  | Marsh, Bradley     | Accounting            | Jan 2021 | Nov 2024 |
| 7  | Boothe, Sean       | Grounds Security      | Aug 2019 | present  | 57  | Hutchins, Danika   | Front Desk            | Nov 2022 | present  |
| 8  | Cabrera, Rhonda    | Audio/Visual          | Dec 2019 | present  | 58  | Mercer, Tyrell     | Grounds Security      | May 2021 | present  |
| 9  | Cardoza, Camila    | Spa                   | Jun 2019 | present  | 59  | Nash, Delia        | Food & Beverage       | Feb 2020 | Sep 2023 |
| 10 | Cardoza, Maya      | Spa                   | Apr 2019 | Jun 2021 | 60  | Nolan, Ebony       | Culinary              | Sep 2020 | present  |
| 11 | Cho, Yara          | Housekeeping          | May 2021 | Jul 2023 | 61  | Nolan, Harold      | Housekeeping          | Oct 2020 | Feb 2022 |
| 12 | Collins, Brie      | Events & Banquets     | Mar 2019 | present  | 62  | Okafor, Robert     | Events & Banquets     | May 2019 | Sep 2022 |
| 13 | Conway, Derek      | Spa                   | Nov 2021 | Apr 2022 | 63  | Okonkwo, Celia     | Food & Beverage       | Jun 2019 | Jun 2023 |
| 14 | Dalton, Camila     | Food & Beverage       | Feb 2021 | present  | 64  | Parker, Kennedy    | Events & Banquets     | Mar 2019 | Apr 2024 |
| 15 | Delgado, Sienna    | Events & Banquets     | Feb 2021 | present  | 65  | Paulsen, Dominic   | Grounds & Landscaping | Apr 2020 | present  |
| 16 | Delray, Sunshine   | Spa                   | Jan 2019 | present  | 66  | Paulsen, Selena    | Food & Beverage       | Jun 2020 | present  |
| 17 | Dumas, Farrah      | Accounting            | Jun 2021 | present  | 67  | Pena, Bradley      | Maintenance           | Oct 2021 | present  |
| 18 | Esposito, Kira     | Grounds Security      | Jul 2019 | present  | 68  | Pena, Jenna        | Valet                 | Mar 2019 | present  |
| 19 | Esposito, Nadia    | Front Desk            | Apr 2019 | Aug 2023 | 69  | Pierce, Heidi      | Grounds Security      | Aug 2021 | Sep 2022 |
| 20 | Fields, Chloe      | Grounds & Landscaping | Jan 2020 | present  | 70  | Pruitt, David      | Audio/Visual          | Aug 2022 | Aug 2023 |
| 21 | Fields, Elena      | Front Desk            | Dec 2021 | present  | 71  | Quill, Ivy         | Front Desk            | Feb 2020 | present  |
| 22 | Fields, Isaac      | Beach Club            | Jul 2021 | present  | 72  | Quill, Shane       | Grounds Security      | Jun 2021 | present  |
| 23 | Flores, Chad       | Front Desk            | Sep 2021 | present  | 73  | Reyes, Harold      | Accounting            | Mar 2022 | Jan 2024 |
| 24 | Flores, Gerald     | Beach Club            | Oct 2021 | present  | 74  | Rhodes, Gemma      | Culinary              | Mar 2021 | May 2022 |
| 25 | Flores, Kira       | Housekeeping          | Nov 2022 | Feb 2023 | 75  | Rivas, Andre       | Spa                   | Sep 2022 | present  |
| 26 | Frost, Camila      | Accounting            | Sep 2021 | Mar 2024 | 76  | Roper, Kacey       | Grounds & Landscaping | Oct 2019 | present  |
| 27 | Frost, Gina        | Concierge             | Apr 2020 | Jun 2021 | 77  | Ruiz, Jaquelyn     | Grounds               | Mar 2020 | present  |
| 28 | Frost, Wanda       | Front Desk            | Jul 2019 | present  | 78  | Sato, Eduardo      | Accounting            | May 2019 | Dec 2023 |
| 29 | Gallagher, Grant   | Grounds & Landscaping | Aug 2022 | present  | 79  | Sato, Jared        | Culinary              | Feb 2019 | present  |
| 30 | Gallagher, Jasmine | Maintenance           | Nov 2020 | present  | 80  | Schmidt, Brooke    | Grounds Security      | May 2019 | present  |
| 31 | Gallagher, Val     | Audio/Visual          | Nov 2022 | present  | 81  | Semanova, Lorraine | Events & Banquets     | Nov 2021 | May 2022 |
| 32 | Gentry, Chloe      | Audio/Visual          | Sep 2021 | Jan 2024 | 82  | Shaw, Aaron        | Grounds & Landscaping | Oct 2020 | present  |
| 33 | Gentry, Elena      | Food & Beverage       | Jun 2020 | Dec 2023 | 83  | Shaw, Ebony        | Concierge             | Mar 2019 | May 2023 |
| 34 | Gentry, Priya      | Concierge             | Oct 2022 | present  | 84  | Shaw, Jenna        | Audio/Visual          | May 2020 | present  |
| 35 | Gentry, Terrence   | Audio/Visual          | Mar 2019 | present  | 85  | Tate, Dominic      | Grounds Security      | Oct 2020 | present  |
| 36 | Gill, Kevin        | Audio/Visual          | Jan 2022 | Nov 2023 | 86  | Tate, Mabel        | Spa                   | Apr 2021 | Mar 2023 |
| 37 | Grady, Jessa       | Beach Club            | Mar 2019 | present  | 87  | Thornton, Damon    | Housekeeping          | Apr 2022 | present  |
| 38 | Grady, Mila        | Maintenance           | Feb 2019 | Oct 2020 | 88  | Thornton, Darnell  | Audio/Visual          | Jul 2022 | Apr 2023 |
| 39 | Hahn, Darnell      | Food & Beverage       | Apr 2019 | present  | 89  | Thornton, Grant    | Housekeeping          | May 2019 | present  |
| 40 | Hancock, Karl      | Audio/Visual          | Oct 2021 | present  | 90  | Thornton, Jerome   | Housekeeping          | Oct 2020 | Aug 2023 |
| 41 | Hancock, Nia       | Culinary              | Feb 2021 | present  | 91  | Ulrich, Kayla      | Front Desk            | Nov 2021 | present  |
| 42 | Halloran, Maggie   | Grounds               | Jul 2019 | present  | 92  | Ulrich, Kira       | Food & Beverage       | Aug 2021 | present  |
| 43 | Hayes, Bradley     | Beach Club            | Feb 2021 | Aug 2022 | 93  | Ulrich, Yara       | Culinary              | Oct 2021 | present  |
| 44 | Ingram, Kendra     | Maintenance           | Jul 2019 | Jun 2021 | 94  | Vance, Allen       | Housekeeping          | Aug 2020 | present  |
| 45 | Jennings, Logan    | Grounds Security      | Sep 2021 | present  | 95  | Wilkes, Andre      | Front Desk            | Jun 2019 | present  |
| 46 | Kirby, Maria       | Events & Banquets     | Jan 2021 | present  | 96  | Wilkes, Camila     | Events & Banquets     | Jul 2020 | Mar 2023 |
| 47 | Larkin, Paul       | Front Desk            | Dec 2020 | present  | 97  | Wilkes, Lena       | Grounds Security      | Aug 2020 | Dec 2022 |
| 48 | Lawson, Colby      | Beach Club            | Jun 2021 | present  | 98  | Wilkes, Reggie     | Housekeeping          | Jul 2019 | present  |
| 49 | Leblanc, Tanya     | Concierge             | Sep 2022 | Mar 2023 | 99  | Yates, Luis        | Audio/Visual          | Jun 2021 | present  |
| 50 | Lowery, Tanya      | Front Desk            | Jun 2019 | present  | 100 | Zamora, Cassie     | Audio/Visual          | Nov 2019 | present  |

Silver Palms Hospitality, LLC — confidential personnel record. Produced pursuant to subpoena.

## FEDERAL BUREAU OF INVESTIGATION

REPORT OF INVESTIGATION — SUPPLEMENTAL

EXHIBIT 11

## SUPPLEMENTAL REPORT — WITNESS INTERVIEWS

|                 |                                                               |                |                              |
|-----------------|---------------------------------------------------------------|----------------|------------------------------|
| CASE            | Silver Palms / Emerald Coast Consulting — Financial & Related | FILE NO.       | [2024-CF-00416]              |
| REPORTING AGENT | SA Bryce Nolan                                                | DATE OF REPORT | April 18, 2024               |
| ACTIVITY        | Employee interviews, Silver Palms Resort                      | PERIOD         | Spring 2024 (pre-separation) |

SYNOPSIS: In the course of the financial investigation, and prior to the team separation of August 2024, agents identified and interviewed a number of current and former Silver Palms Hospitality, LLC employees. Interview subjects were selected from the employee roster (Employee Roster, produced separately) by length of tenure and frequency of event work, on the reasoning that longer-serving, high-frequency staff were most likely to be able to confirm whether outside-vendor work was actually performed. The interviews below are summarized. This selection and summary reflect investigative activity conducted jointly by the reporting agent and AUSA T. Sinclair prior to any wall-off procedure.

## NARRATIVE

**BRIE COLLINS** (Events & Banquets; employed since March 2019) was interviewed regarding staffing of resort events. Collins, an events lead with direct knowledge of event staffing, stated that Silver Palms events were staffed primarily by the resort's own banquet and events personnel. Collins reviewed several 2023 events for which Emerald had billed Coastal Event Solutions, LLC, and stated that resort staff had worked those events, and that Collins recalled seeing at most one or two Coastal staff at any given event. Collins was shown the name Ky Chandler and stated Collins had never heard of him. Collins described Ms. Calloway as hands-on and well-liked by staff and stated Mr. Donovan was rarely present on the event floor.

**COLBY LAWSON** (Beach Club, dock; employed since June 2021), known to coworkers by the nickname "AI," was interviewed regarding the same period. Lawson works the resort dock and had limited knowledge of event staffing or vendor billing. Lawson volunteered that Lawson frequently assists Ms. Collins and expressed a high personal regard for Ms. Calloway. Lawson was shown the name Ky Chandler and stated Lawson did not know him. The interview did not develop information material to the vendor question. Lawson was cooperative.

**SUNSHINE DELRAY** (Spa Manager; employed since January 2019) was interviewed regarding resort operations and ownership. Delray, a department manager with periodic contact with ownership, stated Delray was aware of "Coastal" as a vendor name but had never met anyone who worked for it, and had never heard the name Ky Chandler. Delray volunteered personal observations concerning Mr. Donovan and his relationship with Ms. Calloway, and offered the opinion that Mr. Donovan and Ms. Calloway were personally close. Agents noted these observations appeared to reflect the witness's personal perspective. Delray provided no direct knowledge of the vendor billing.

**SEAN BOOTHE** (Grounds Security; employed since August 2019) was interviewed regarding activity and access on the resort grounds. Boothe, whose duties provide broad sightlines to deliveries, outside crews, and comings and goings on the property, stated Boothe did not recall regular outside "Coastal" crews on the grounds during the covered period and had never heard of Ky Chandler. Boothe stated that, in Boothe's understanding, Mr. Donovan handled the resort's finances and outside contracting while Ms. Calloway managed resort operations and staff. Boothe was measured and declined to speculate beyond direct observation. Asked about Mr. Blake, Boothe recalled Mr. Blake as the accountant who kept late hours, describing Mr. Blake's office as heavily cluttered with files and paperwork covering the desk and surfaces. Boothe noted this appearance was consistent whenever Boothe passed the admin wing during evening rounds.

No interview subject reported first-hand knowledge of Coastal Event Solutions' ownership, operations, or personnel, or any recognition of Ky Chandler. Additional interviews did not yield new information and are documented separately.

Reported by:  — SA Bryce Nolan, FBI

This document is a summary of interviews prepared by the reporting agent and does not purport to be a verbatim account. Prepared in the ordinary course of the investigation. Interview selection and activity described occurred prior to the August 2024 team separation.

**UNITED STATES DISTRICT COURT  
FOR THE FOURTEENTH JUDICIAL DISTRICT**

UNITED STATES OF AMERICA,

vs.

Case No. 2024-CF-00416

SAINT DONOVAN

Defendant.

**ORDER GRANTING IMMUNITY TO EMILY CALLOWAY**

On motion of the United States Attorney,

IT IS ORDERED, pursuant to Title 18, United States Code, Sections 6002, 6003, Emily Calloway is granted immunity from criminal prosecution arising out of any testimony or other information which she may be compelled to give in the above entitled case and no testimony or other information given by her may be used against her in any criminal prosecution except a prosecution for perjury, giving a false statement, or otherwise failing to comply with this Order.

IT IS FURTHER ORDERED that Emily Calloway is compelled to testify and answer questions in this case.

IT IS FURTHER ORDERED that Emily Calloway will remain under the jurisdiction of this Court until discharged.

Dated this 23rd day of August, 2024.

/s/ EIB

Elizabeth I. Boals

Chief Judge

United States District Court for  
the Fourteenth Judicial Circuit

**UNITED STATES DISTRICT COURT  
FOR THE FOURTEENTH JUDICIAL DISTRICT**

UNITED STATES OF AMERICA,

vs.

Case No. 2024-CF-00416

SAINT DONOVAN

Defendant.

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**EXCERPT OF THE TESTIMONY OF EMILY CALLOWAY**

DIRECT EXAMINATION BY COUNSEL FOR THE UNITED STATES:

[ . . . ]

Q. I want to take you to the night of the resort's staff holiday party, December 10, 2023. You've described your conversation with Mr. Blake. After that conversation ended, what happened?

A. I stepped away from him. I was upset. And one of our staff, Kennedy Parker, came over to me and asked if I was all right – if everything was okay.

Q. Who is Kennedy Parker?

A. Kennedy works for us – events and banquets, has for years. Kennedy's one of those people who's just always around a party, working it, keeping an eye on everything. That's the kind of employee Kennedy is. I'd have Kennedy and a few of the others help me with things all the time. Run an errand. Drop something off. Pick something up. That was normal for us. So Kennedy coming over to check on me, that wasn't unusual.

Q. What did you say to Kennedy Parker?

A. I told Kennedy it was nothing. That everything was fine. I didn't want to get into it. I just wanted the night to be over.

Q. Did you say anything else to Kennedy Parker that night?

A. No. That was it. Kennedy went back to working the party, and I left not long after.

[this concludes the excerpted portions of Emily Calloway's testimony]

MONDAY, OCT. 14, 2024

LOCAL & COURTS

GULFHAVENTRIBUNE

DONOVAN MURDER TRIAL — DAY 4

## 'One Last Chance': Calloway Testifies to Fatal Confrontation With Accountant

*Resort co-owner, testifying under immunity, describes the Christmas-party argument that prosecutors say set a murder in motion — and the late-night call that followed.*

By DELIA MARCHETTI, Tribune Staff Writer · Updated 6:14 p.m.

**E**mily Calloway took the stand Thursday in the murder trial of her business partner, Saint Donovan, and delivered the account prosecutors had promised the jury: a tense holiday-party confrontation with the resort's accountant, two nights before he was killed.

Testifying under a grant of use immunity, Calloway told jurors that accountant Daniel Blake approached her at the Silver Palms Resort Christmas party on the night of December 10, 2023, and told her he had discovered financial irregularities and taken them to federal investigators.

**"He told me it was my one last chance to do the right thing."**

"He told me it was my one last chance to do the right thing," Calloway testified, her voice steady. She said she replied that he was "making a mistake." Calloway testified only one other person saw the pair argue; resort employee Kennedy Parker, who was unable to be reached for comment.

Blake was found dead two days later. Prosecutors contend that within minutes of the confrontation, Calloway telephoned Donovan — a call records confirm was placed at 11:47 p.m. — and that Donovan arranged Blake's killing the following day.

Calloway, who has not been charged in connection with the case, testified that she telephoned Donovan that night about what she called "the Blake problem," but maintained she never intended or arranged for anyone to be harmed. "I did not know what he was going to do," she said.

The phrase "one last chance to do the right thing" — attributed to the victim in his final days — has quickly become the emotional center of a trial that has gripped Gulf Haven for weeks. Local broadcasters carried Calloway's testimony live, and the quotation led the evening newscasts on at least three area stations.

Defense attorneys for Donovan sought to portray Calloway as the more culpable party, noting she ran the resort's day-to-day operations. Prosecutors countered that Donovan controlled the finances and hired the killer.

Thursday's session drew the largest gallery of the trial to date. Spectators lined the corridor outside the courtroom before doors opened, and an overflow room was made available on a lower floor. Calloway, dressed in dark colors, testified for just under five hours, pausing at several points and declining a brief recess offered by the court.

Under questioning, Calloway described a resort where, she said, the two owners divided their responsibilities sharply: she oversaw events, staffing, and guest services, while Donovan managed contracts, vendors, and the books. Asked whether she reviewed the payments that Blake had flagged, she said she had not examined them in detail and had trusted her partner's handling of the resort's finances.

Prosecutors walked Calloway through the days surrounding Blake's death, including the timing of phone calls and the movement of records at the resort. She acknowledged asking staff to run errands for her from time to time but said she could not recall the specifics of every request.

The Silver Palms Resort, a Gulf Haven landmark operated by the Calloway family for nearly a century, has been shadowed by the case since Blake's death. Longtime employees, several of whom sat in the gallery, have described a workplace unsettled by the investigation and the loss of a colleague.

Legal observers have noted that testimony given under immunity carries particular significance, shielding the witness from having the statements used against them while leaving open questions a jury must weigh. Prosecutors have said they intend to rest their case in the coming days.

Testimony is expected to continue into next week.

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**FEDERAL BUREAU OF INVESTIGATION**  
Office of the United States Attorney — Fourteenth Judicial Circuit

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**INTERNAL MEMORANDUM — LAW ENFORCEMENT SENSITIVE**

**TO:** File — United States v. Donovan (No. 24-CF-00416); related financial investigation  
**FROM:** SA Bryce Nolan, Case Agent  
**PREPARED:** August 22, 2024  
**RE:** **Establishment of investigative separation (“wall”) in advance of compelled testimony of Emily Calloway**

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This memorandum documents the division of personnel and the information-handling procedures adopted in advance of the compelled testimony of Emily Calloway, which is expected to be given pursuant to an order conferring use and derivative-use immunity. The purpose of these procedures is to preserve a clear separation between (a) the continued prosecution of Saint Donovan, which will make use of Ms. Calloway’s compelled testimony, and (b) the continuing investigation of Ms. Calloway, which must proceed only from evidence obtained independently of that compelled testimony.

**1. DIVISION OF PERSONNEL**

Effective this date, assigned personnel are divided into two teams:

1. **Team Donovan.** Responsible for the prosecution of Saint Donovan. This team will receive, review, and use Ms. Calloway’s compelled testimony and any materials or impressions derived from it. AUSA Tatum Sinclair, lead.
2. **Team Calloway.** Responsible for the continuing investigation of Emily Calloway. This team is walled off from Ms. Calloway’s compelled testimony and from any information, summary, lead, or strategic impression derived from it. SA Bryce Nolan, lead.

**2. DUPLICATION AND SEGREGATION OF THE CASE FILE**

The existing case file has been duplicated so that each team maintains its own separate copy. From this date forward, all newly received evidence, notes, and work product will be marked and filed as Team Donovan or Team Calloway, so that any member of one team who encounters material belonging to the other will recognize it immediately and set it aside.

**3. ACCESS RESTRICTIONS**

1. No member of Team Calloway shall receive, review, or be made aware of the content of Ms. Calloway’s compelled statements.
2. No member of Team Calloway shall receive any summary, characterization, or strategic impression drawn from those statements.
3. No member of Team Calloway shall receive any investigative lead that originates from those statements.
4. The two team leads will not discuss the substance of the Calloway testimony nor investigation with one another, effective immediately.

**4. PRESERVATION OF THE INDEPENDENT RECORD**

To establish a clear line between what Team Calloway possessed before the wall and what it develops afterward, the Calloway team will prepare and maintain a contemporaneous record of the evidence, leads, and investigative steps already in hand as of this date. That record is maintained separately.



SA Bryce Nolan — Case Agent — August 22, 2024



Calloway Team - To Do  
 (post-split - Donovan/Calloway teams now separate)  
 B.N. - wk of 8/25

Ongoing/carry-over:

- Finish Emerald bank analysis (Q3 wires)
- Coastal → Cayman: chase MLAT (sub. 6/23/pending)
- Corp filings → confirm Chandler as nominee on All
- re-run Chandler (where is he? no accts, no property)

Circle back - employee interviews:

- go back thru staff; interview remainders
  - confirm real v. fake work LONA list; develop month to month plan
- |                            |                           |
|----------------------------|---------------------------|
| - R. Okafor (Banquets mgr) | - J. Ruiz (grounds lead)  |
| - D. Pruitt (AV)           | - A. Vance (housekeeping) |
| - L. Semenova (events)     | - C. Okonkwo (E&B)        |
| - T. Bell (front desk)     | - S. Delgado (banquets)   |
| - K. Parker (events)       | - P. Larkin (front desk)  |
| - M. Halloran (grounds)    | - N. Achebe (events)      |

3 rest of Dec. 23 party shift list  
 + pull full roster from HR

Notes:

walked off from E.C. testimony → log everything

## Employee Interview — Priority List

Silver Palms Hospitality personnel — first-round interview list

*Prepared by SA Bryce Nolan (post-separation, pre-testimony). Drawn from the Silver Palms employee roster (2019–2023). Ranked by frequency of shifts worked during 2023.*

| #  | Employee (Last, First) | Department        | Basis / Note                             | 2023 Shifts |
|----|------------------------|-------------------|------------------------------------------|-------------|
| 1  | Collins, Brie          | Events & Banquets | Events lead; present at most 2023 events | 211         |
| 2  | Boothe, Sean           | Grounds Security  | Property-wide presence; long tenure      | 198         |
| 3  | Delray, Sunshine       | Spa               | Dept. manager; frequent event coverage   | 181         |
| 4  | Kirby, Maria           | Events & Banquets | Frequent event/banquet shifts            | 180         |
| 5  | Hahn, Darnell          | Food & Beverage   | Event F&B; frequent                      | 178         |
| 6  | Nash, Delia            | Food & Beverage   | Event F&B; frequent                      | 177         |
| 7  | Parker, Kennedy        | Events & Banquets | Frequent event/banquet shifts            | 176         |
| 8  | Lang, Rachel           | Events & Banquets | Event/banquet shifts                     | 151         |
| 9  | Dalton, Camila         | Food & Beverage   | Event waitstaff                          | 146         |
| 10 | Frost, Wanda           | Front Desk        | Guest services; frequent event check-in  | 139         |



SA Bryce Nolan — Team Calloway

## **VOLUNTARY WITNESS STATEMENT**

Federal Bureau of Investigation  
Gulf Haven Field Office

Case / File Reference: E. Calloway

EXHIBIT 18

Name: Kennedy Parker

Employed at: Silver Palms Resort

Statement Date: October 31, 2024, 2:15 p.m.

### **Where and when did this incident happen?**

Silver Palms Resort, Gulf Haven. The events I describe took place in 2023, mainly at the staff Christmas party on December 10, 2023, and on December 20, 2023.

### **Who was involved? (Include names and addresses if known)**

Emily Calloway, resort co-owner. Daniel Blake, the resort accountant. A Coastal Event Solutions manager I knew as "Guy." And myself, Kennedy Parker, events and banquet staff.

### **What happened?**

I have worked at Silver Palms as events and banquet staff since 2019. I know Ms. Emily Calloway as one of the owners. From time to time she asked me to run errands or drop things off for her, which was normal and I did often.

When Coastal Event Solutions worked events at the resort, their crew was run by a manager named Guy. Whenever Coastal was there, I saw Guy check in with Ms. Calloway directly.

At the staff Christmas party on December 10, 2023, I came upon Ms. Calloway and Mr. Blake having a tense argument near the coat check. I heard Mr. Blake say there was a problem with the payments and that he was giving her one last chance to do the right thing, and I heard Ms. Calloway say he was making a mistake and to back off. A little later I asked Ms. Calloway if everything was okay, and she said it was nothing.

On December 20, 2023, Ms. Calloway asked me to take a file box for her. It was a banker's box marked "Coastal" on the side. When I picked it up the lid slipped and I saw papers on top, one of which looked like it might have been a bank record with columns of numbers, but I did not go through the box. She gave me an address, a gate code, and a unit number, and told me where the key was. I took the box to a self-storage unit off-site, about fifteen minutes away, put it inside, and locked it. I assumed the unit was hers. I did not think anything of it at the time.

I did not report any of this at the time because it did not seem like anything. No one from the government spoke to me about these events before today.

I declare that the foregoing statement is true and correct to the best of my knowledge and belief. It is given freely and voluntarily, in my own words.

*Kennedy Parker* 

Signature of Witness — Kennedy Parker

Date

*10/31/2024*

*B. Nolan*

Officer Receiving Statement — SA Bryce Nolan, FBI



RECOVERED ITEM

Storage Unit / Search

11/05/2024 · Item 14

EXHIBIT 19

**STERLING & CAYE**  
**PRIVATE TRUST**

GEORGE TOWN · CAYMAN ISLANDS

PRIVATE & CONFIDENTIAL — CLIENT COPY

|                                        |                                              |
|----------------------------------------|----------------------------------------------|
| ACCOUNT HOLDER (REGISTERED)            | Marsh Holdings Ltd. (Cayman Islands company) |
| ACCOUNT NUMBER                         | CYMB — 0037 — ****1180                       |
| ACCOUNT TYPE                           | Private Investment / Holding                 |
| DATE OPENED                            | 14 November 2017                             |
| ULTIMATE BENEFICIAL OWNER              | EMILY R. CALLOWAY                            |
| UBO — ADDRESS OF RECORD                | 2200 Shoreline Drive, Gulf Haven, FL, U.S.A. |
| NOMINEE DIRECTOR (MARSH HOLDINGS LTD.) | Ky Chandler                                  |
| SOURCE OF FUNDS (DECLARED)             | "Event & hospitality consulting proceeds"    |

**BENEFICIAL OWNERSHIP DECLARATION**

The undersigned confirms that Emily R. Calloway is the sole ultimate beneficial owner of the assets held in the above-referenced account, holding one hundred percent (100%) of the beneficial interest in Marsh Holdings Ltd. and its accounts. The nominee director named above holds legal title in name only and exercises no beneficial interest. This declaration is maintained by the institution in satisfaction of its client due-diligence obligations and is to be held in strict confidence.

**BENEFICIAL DESIGNATION**

In the event of the incapacity or death of the beneficial owner, the beneficial interest shall pass in accordance with instructions held on file. Correspondence relating to this account is to be directed to the beneficial owner only, and not to the nominee owner.

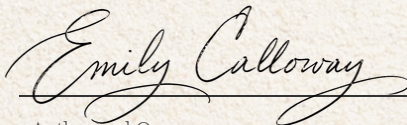
  
Authorized Owner





EXHIBIT 20A





EXHIBIT 20B

**ATTORNEY WORK PRODUCT – PRIVILEGED & CONFIDENTIAL**

Interview: Sierra Seton (former operations manager, Coastal)

Documented by Maddox Armana for the Calloway defense, Feb. 2024.

Only Seton and Maddox Present

Background:

- Worked Coastal apprx 2018-2021, “operations.” Ran scheduling, some payroll, vendor coordination
- Says Coastal did real events work, but no where near enough to match the \$\$\$ coming in (real work as a cover? Fraction of billings)

Chandler

- Listed owner. S. says Chandler “not really around,” didn’t make decisions, signed what he was told to.
- S thought he was a placeholder, paid little (that seems right: owner on paper, not owner in fact)
- (Emily controlled Coastal thru Chandler as nominee owner???)

Who ran it

- Instructions came through Donovan side, but S says the real calls, pricing, what events to “bill”, where money went – traced back to Silver Palms owner. Not Donovan “the other one”. (S never says the name Calloway, but clearly that’s what she meant)

Money out

- S aware of transfers “offshore,” didn’t handle them, quarterly-ish; didn’t know account holder  
(\*\*\*\*FOLLOW UP: where do the wires land? Who owns the receiving account? - press S next meeting)

Records

- S thinks addtl Coastal records may still exist; boxes/files pulled out of the resort at some point. Didn’t know where. (worth chasing – could be the whole ballgame if those records name the owner)



