

August 29, 2012

Heidi E. Brewer, Bar Counsel
Attorney Consumer Assistance Program
Florida Bar File No. 2013-00,124
651 East Jefferson Street
Tallahassee, FL 32399-2300

Dear Ms. Brewer:

On January 26, 2011, my son's 20-year-old pregnant ex-girlfriend (21 weeks) and her 17-year-old brother were found murdered in their residence. Without sufficient evidence, the Leon County Sheriff's office immediately made my son their prime suspect. My son, DeShon Rashard Thomas, was 17-years-old at the time. He was working over 35 hours a week at Taco Bell and he was a full-time student at Tallahassee Community College. He had recently moved in with his co-worker, 21-year-old Trentin Ross. According to what I've read in the Discovery Report provided to me by none other than Mr. Cummings (per my request), upon the sheriff's office obtaining my son's cell phone number, the sheriff's office faxed a court order to my son's cell phone carrier later that evening requesting that they put it under GPS tracking. After reading detective statements , as soon as the court order was faxed to the cell phone carrier, a pack of deputies went on a manhunt for my son. First stop, his current girlfriend's house. He'd just left her house in a taxi cab before they got there. Next, they called the taxi cab company to find out where he'd been dropped off--at a tattoo parlor to meet up with his cousin. Deputies staked out the tattoo parlor. My son left the tattoo parlor in an SUV with his cousin and his cousin's friends. Then deputies pulled over the SUV. Among other things, they asked my son to come to the sheriff's office, he declined. Then a deputy took pictures of his shoes. My son told me that as the deputies used a K-9 dog to sniff the SUV, another patrol car pulled up. In the backseat of that patrol car was a white girl. A deputy had the three males (including my son) stand side by side as the white girl looked them over. The white girl shook her head no and then was led back to the patrol car. My son was not arrested. I was unaware of any of the events because I'd been out of town. But when I returned to Tallahassee the next evening and my son told me about the murders, the traffic stop and the possibility of the police following him, we decided to go to the police station and give a statement. Upon arriving at the sheriff's office, I told a deputy at the desk why my son and I were there. Three detectives came to the lobby where my son and I were sitting, immediately one of the detectives made racist statements. Unbeknownst to me, my son had already been racially profiled and their number one suspect. After an exchange of words, they took my son up to an interrogation room. I told the deputy that I wanted to get an attorney for my son and that they needed to send my son back down. They never sent my son down. For hours I was in the lobby protesting. Then I was escorted up to where my son was being held. There my son and I were locked in an interrogation room. Neither my son nor I was under arrest. When I learned that we were locked in the room, I was upset. I asked the same racist detective why we were being held in a locked room. His response was, "You don't want the door locked?" When I told my son, let's go, still he would not let us leave. After a few more hours, this racist detective got mad and told me to leave the sheriff's office. I told my son, "Let's go". That's when he said that my son wasn't going anywhere and that he was under arrest. When I asked him what the charges were, he didn't answer. Instead, he yelled at me and escorted me out of the building. It was now 2 a.m. A few hours later. I received a phone call

from the Juvenile Assessment Center to come pick my son up. That's when I learned about the Cultivation of Marijuana and Possession of Drug Paraphernalia. So, while we were being held hostage at the Leon County Sheriff's office, they had served a search warrant on Trentin Ross' one-bedroom apartment. In Juvenile Court, because the five potted plants with stems sprouting from them were found in Trentin Ross' closet and he admitted to caring for the plants, the judge didn't find Probable Cause. However, the State Prosecutor asked for 72 hours to "Perfect". Within those 72 hours sheriff's deputies and detectives acted like "wild animals on the loose". When my son and I went to Trentin Ross' apartment to retrieve my son's personal belongings, deputies and detectives swarmed the apartment complex. But not before I had the opportunity to speak with Trentin Ross. Trentin Ross told me that on January 28, 2011 (while my son and I were being held hostage at the sheriff's office), deputies showed up to his job and handcuffed him stating that he was under arrest because he was involved in a homicide. When it was all said and done, he was arrested and charged with Cultivation of Marijuana and Possession of Drug Paraphernalia. He was released under the conditions that he not come in contact with my son. He told me that he had been questioned about the homicides. But he didn't know anything about them. He said that he was told by the detectives that my son had committed the murders. I asked him about his whereabouts on January 26th up until the time when my son got off from work in the early morning hours of January 27th. He told me that he had been out all day with a male friend until 4 a.m. I then asked him where my son was when he got home; he said that my son was on the couch asleep. Right in the parking lot of Right in the parking lot of Trentin Ross' apartment complex, I personally witnessed deputies' badger/bully Trentin Ross in an attempt to get him to make an incriminating statement about my son. Although my son was there suspect, my heart went out to him. Their actions were ridiculous. I was not at the least surprised when they used him to concoct the statement that led to my son's arrest. Well, his first statement, when he was arrested for Cultivation of Marijuana and Drug Paraphernalia, he does tell them that he doesn't know about the homicides. It's not until a few days later, where they have him telling a different deputy (the racist detective that kicked me out of the sheriff's office) a completely different account of events—placing himself at the crime scene by saying that he drove my son to the victims' residence in the early morning hours. The reason why I chose to discuss this part of my son's case is because other defense attorneys that I'd spoken with before retaining Mr. Cummings seemed to want to attack the case from the root. Asking questions like: Why did the detectives suspect your son? What led them to serve a search warrant on Trentin Ross' one-bedroom apartment? In the beginning I had no idea as to the answers to the questions above. I didn't get a copy of the Discovery Report until September 2011. By then my son had been broadcasted on the news, his picture in the newspaper, indicted by a grand jury, etc. When I read the Discovery Report, I was hurt, sick, disappointed, disgusted—there were a range of emotions going on inside of me. The Discovery Report was riddled with LIES. First of all, Leon County Sheriff's detectives had no right to get a court order to have my son's cell phone put under GPS tracking. Next, they lied to the judge to get a search warrant for Trentin Ross' apartment. They lied to the judge to get an arrest affidavit. They lied to a grand jury to get an indictment. They lied to the media. All the while saying that the victims were killed with a 9mm handgun; saying that the victims' wounds were consistent with a 9mm handgun. From what I was told about two shots to the head using a 9mm—it would've left a huge holes in their heads—just about blowing their brains out (in the Discovery Report in the FDLE section it clearly states that the victims were killed with a .380 caliber handgun. Can an experienced Medical Examiner not be able to tell the difference between a .380 caliber bullet wound and a 9mm bullet wound? I mean I have heard that in some cases .380 bullets can be used in a 9mm. But there's a risk of misfire and the bullet getting jammed or something like that. Also, there's a witness who tells detectives that the

male victim owned a .380 caliber handgun—the murder weapon was not found). Detectives typed up an excel spreadsheet that they so poorly created to try to pass off as cell phone records. They used Map Quest to pass off as points of cell phone tower hits. They really didn't have anything authentic from the cell phone carrier. They modified text messages between my son and the female victim—instead of using their Cellbrite software. I can go on and on with this. Yet, Mr. Cummings wants my son and I to believe that my son's freedom is hanging in the valance of Trentin Ross'. Trentin Ross, who my son had sex with his girlfriend while living with him—which makes him a hostile witness; the getaway driver, who said that from across the street sitting in a car that he heard two shots—when the victims were shot two times each in the head—which equals four shots.

With all of the above—waiting to hear Trentin Ross' testimony is the best defense Mr. Cummings has planned.

As you may have noticed in Mr. Cummings response to my complaint to the Florida Bar, with the knowledge of everything in the Discovery Report, he fails to mention anything in favor as to my son's defense. This is not the 1980s. I would think that today's jury would want to hear more than the testimony of an adult witness who admits to being the getaway driver from a crime scene where two people were murdered and a toddler was left to fend for herself in their own residence, and the murderer was a teenager.

In Mr. Cummings response to my complaint, he made several false or misleading statements that I did not read in the Discovery Report in regards to Trentin Ross' (the State's key witness) statements: In Mr. Cummings false statements are in the paragraph that discusses 500 pages and 60 CDs: Mr. Cummings false statement is about Trentin Ross: "heard shots, saw Deshon run out the back door and leave the back door open". I've read and re-read the Discovery Report provided to me by Mr. Cummings. There are 3 or 4 statements given by him. There's also a missing statement from him that was taken by Detective Melinda McBride who was the original lead detective the first night that he was arrested (she was replaced by a known liar). I never read where Trentin Ross made a statement that he saw my son run from the victims' residence (which was a townhouse) let alone out of the victims' back door. And nobody can really firmly say what the condition the back door was in because according to a statement made by the victims' mother's girlfriend she "noticed that the back door was wide open" as they turned the corner to go to the front of the townhouse. On the CAD Report, according to victims' mother the back door looked like it had been "kicked in". And according to the first deputy on the scene, the back door was open six inches (6 inches is not wide open). Also, the back door opened up to Highway 20 which is a heavily traveled road; how would the wind from the vehicles passing by effect the back door? The misleading statement that Mr. Cummings made was that my son's DNA on the back door knob on the inside and outside, there were other male contributors DNA on that door knob. And my son did once live at that residence. The statement that Mr. Cummings made in the same paragraph is within the parentheses "may have been there a few days before", in the Discovery Report that statement was made by the victims' mother's girlfriend who is clearly an instigator. Mr. Cummings has been on this case for over a year and he does not know if that is a true or false statement? I mean since he brought it up then it must be relevant. Is it not the job of a defense attorney to make hearsay statements irrelevant? The victims were found on January 27, 2011 on a Thursday morning. I spoke with the female victim the previous Monday (Jan. 24), that following Tuesday (Jan. 25) according to the victims' step-sister around midnight on the 24th and around 1 a.m. on the 25th, they were out rounding up a "Posse" and then went over to the female victim's best friend's house and got into a major confrontation that involved ten or more people and a fight almost ensued. It was because she (the victim) owed her best friend and her best friend's mother approximately \$400 and threats were being made over Facebook. Before arriving at the best friend's house

the female victim warned her "posse" that the best friend's mother has a gun. Had my son gone over to the victims' residence on January 25, 2011, why in the last text message between the victim and my son (on Jan. 26), was he asking her what was going on between her and her best friend? I would think that she would have told him all about during his visit. Also, Mr. Cummings says that the only answer that my son has for his cell phone is that Ross must have taken his phone and probably sent himself a text message using his phone—well, what else can he say? He says it didn't happen. He slept in the living room at Trentin Ross' apartment where his cell phone was accessible to anyone who entered the apartment while he was asleep. Nobody has shown him an authentic cell phone record. In the Discovery Report, I read where an analysis said that Trentin Ross' cell phone records don't show text messages—phone calls only. So really—is my son supposed to lie?

How sad it is for Mr. Cummings to be representing a 17-year-old for two counts of 1st Degree Murder and say that his mother asks "frivolous questions". The main reason why I have questions is because Mr. Cummings never seems to have answers. I still question how much of the Discovery Report Mr. Cummings actually read and comprehended. Because for an attorney answering a complaint filed by a client's mother, how could he even attempt to bring such poorly choice of examples to use as to discredit my complaint? The truth is, there is nothing solid in the Discovery Report that can connect my son to those murders. As an attorney with so many years of experience, he should know how to handle a mother of uncertainty. As you will see in this response, it was Mr. Cummings who first asked me to provide him with questions to ask for the depositions of Tracy Bush and LaShonda Perkins (the victims' mother and mother's girlfriend). Also, you will see that Mr. Cummings assigned me tasks to handle for him, whether it be making copies or delivering messages to my son.

Mr. Cummings states that I'm controlling---MY 17-YEAR-OLD SON'S LIFE IS UP IN THE AIR BASED ON LIES! MR. CUMMINGS SAYS THAT BECAUSE MY SON IS OLDER, HE APPEARED WISER! APPEARED WISER? HE'S SPENT TWO BIRTHDAYS IN JAIL—HE'S 19-YEARS-OLD NOW. WISER-- REALLY? OVER THE COURSE OF A YEAR MR. CUMMINGS ONLY SAW HIM 3 TIMES. IF HE WAS WISER HE WOULDN'T HAVE TAKEN THE BAIT THIS PAST JUNE IN AN ATTEMPT TO GIVE THE STATE A WAY OUT OF THIS HUGE MISTAKE THAT THEY MADE BY HASTILY ARRESTING HIM. Yes, my son says that they used entrapment tactics in order to charge him with Solicitation to Commit Murder-- and yes—I believe him. The Probable Cause in the Solicitation case is just as pathetic in the double murder case. Six months or so ago I had someone text me about killing Trentin Ross. I had two associates record our phone conversation, I'm sure via Leon County Sheriff's deputies. And in June, I found out that the young man who the victims' mother seemingly suspected as the murderer of her children had been arrested a few months after their murders for Assaulting someone with a Gun. I couldn't help but to wonder if it was the same gun used in the murder of the victims. Despite this young man's (17-year-old) extensive juvenile record, they kept these charges in juvenile court. (Whereas, in the case of my son, his past two Possessions of firearms charges were kept in the Juvenile Court, but the bogus Cultivation of Marijuana charge was Direct filed into Adult Court.) I didn't know where to go with the information that was coming in to me because Mr. Cummings didn't have an investigator on this case. And just like I lost trust with the Leon County Sheriff's office, I was beginning to lose trust in Mr. Cummings.

I have reason to believe that Mr. Cummings provided me with manipulated information. And then was willing to pass on that manipulated information to my son—his client. Before I retained Mr. Cummings, he knew the three most important piece of evidence that my son and I wanted to review: the results of the paternity test, the victims autopsy report (time of death) and my son's cell phone records. To date my son and I know the test results of the paternity test—that's all. The two key pieces of evidence that can exonerate my son. has been kept from

us by both Mr. Cummings and Assistant State Attorney/prosecuting attorney Jack Campbell. I say Assistant State Attorney Jack Campbell because in June I called the District Two Medical Examiner's Office requesting a copy of the victims' autopsy report and I was told that they couldn't release it because the status was "on-going investigation". The person directed me to the State Attorney's Office. I went down to the State Attorney's Office and a staff member there pulled up the same information. After we discussed it a little bit she directed me straight to Jack Campbell's office to speak with him. I chose not to go.

As far as my son's knowledge of my complaint to the Florida Bar, Mr. Cummings is absolutely right! My son did not know that I was filing this complaint. Knowing that our phone calls were being recorded and knowing that a couple of my associates were scheming with law enforcement, I didn't want my son to know because I just had a gut feeling that the minute I mentioned to have Mr. Cumming fired, the State would retaliate (because by now, I was convinced that the real problem that the State Prosecutor was having was getting Trentin Ross to come back to Tallahassee to lie on the stand. And I just sensed that something wasn't right about Mr. Cummings). Mr. Cummings and my son were in court on July 17, 2012 for a case management hearing; whereas my son's trial date was rescheduled to October. At that time Mr. Cummings became aware that I was unhappy with him and wanted my son to FIRE him. Mr. Cummings admits that my son didn't want to FIRE him. Mr. Cummings tells my son that I can't FIRE him. Mr. Cummings emails me telling me that I can't FIRE him. For about 2 weeks, Mr. Cummings and my son do a song and dance about whether or not Mr. Cummings is going to stay on as his attorney. On August 9, 2012, Mr. Cummings received a copy of my Complaint form from the Florida Bar. On August 17, 2012, while attending a rally in Pensacola, my son calls me to tell me that he's been charged with Solicitation to Commit Murder (coincidence—I don't think so). Five minutes into our conversation the phone goes dead. The next day, August 18, 2012, on my way back home I stop in Tallahassee to go visit my son at the Leon County Jails. I learn that he's in confinement and can't have any visitors—other than an attorney. On August 19, 2012, I received an email from Mr. Cummings saying that I'm not going to be charged with an offense (I wasn't bothered at all by that statement). On August 20, 2012, I received an email from Mr. Cumming with an attached Probable Cause Report for the Solicitation to Commit Murder charges—all a coincidence—I don't think so. And neither do the community leaders that I've been talking too. People were wondering how the State was going to attempt to get out of this hole that they'd dug themselves in.

I stopped paying Mr. Cumming in April 2012— I got no response from him. Over the past year and a half my son called him—he got no response. I continued to email Mr. Cummings—I got no response. I emailed him a list of questions to ask Trentin Ross just to see how he would react—I got no response. Either Mr. Cummings was just not interested or already knew what the intended outcome of my son's trial would be. Again, he never presented a legal defense to us. In his response to my complaint he doesn't justify anything. He just basically states that he's been an attorney for over 32 years and he does things the way he wants to them. He doesn't even sound like he was out to put on the best defense. He says that he doesn't "coddle his clients". Well, he sure did "coddle" me over 3 weeks to get on to my son's case, despite me telling him that I wanted to talk to his court appointed attorney first. Besides that, my son was 17-years-old, a teenager in an adult system. If he didn't want to play "daddy", then he shouldn't have taken mama's money. What did he ever tell my son to comfort him or give him a glimmer of hope? He never asked my son anything about the relationship between him and the female victim.

When my son told me that Mr. Cummings said that he would stay on his case regardless if I paid him, I told my son that if he continued on with Mr. Cummings he was on his own. Why would Mr. Cummings go from just about ignoring my son to wanting to represent him minus

\$21,440? Now that I hear how he felt about my son's case (whew!). At this time I do not have access to my old checkbook. Besides, for me—the money is a small factor.

Mr. Cummings says that my son didn't seem to want him to be taken off of his case. Well, that's where he should've seen that my son clearly was not wiser. My son wants to be out of jail. He doesn't want his trial date to keep getting pushed back because of all of these different reasons. I'll be the first to admit— I'm not my son's best friend. I'm his mother; therefore, I don't need a "best friend" title. My son is well aware of my level of control. He knows that it's always for his best interest. And the only way a person can take that control away from me as a mother, is when they do something illegal. But that's why I have God on my side. He will expose it all. Way before Mr. Cummings took my son's case, he knew how I felt about that racist detective—Detective Odham, the one that kicked me out of the sheriff's office. Detective Odham replaced a woman detective and became lead detective over my son's case. He was a 17 year Reserved Deputy and from my understanding did not have the experience to be lead detective. He was FIRED from the sheriff's office. That same building that he disrespected me and my son in and then wrongfully kicked me out of—well—a few months later—he was kicked out of the same building in shame. Imagine that... Now, I would think that Mr. Cummings would've at least told me or my son that the once lead detective on his double murder case lacked experience and had been FIRED. Regardless, if the two had nothing to do with each other—but Nope—Mr. Cummings never said a word to us.

My statement of events/ emailed information:

Acting on a referral by what I believed at the time was an employee for a bail bondsman; I first met with Mr. Cummings in a back office at a bail bondsman's office in mid-February 2011. After listening to Mr. Cummings discuss his experience as a defense attorney, I explained to him that I'd already spoken with other defense attorneys and that I was really wanting to wait to speak with whomever the state appointed as my son's attorney before I hired an attorney. Some of the reasons that I gave Mr. Cummings was because of my lack of finances and that the Probable Cause didn't make sense. Specifically, that the text message pattern from the female victim didn't make sense because in the past she and I had texted before... Also, detectives said that my son didn't want to pay child support to the female victim—I knew that wasn't true; and I'd read on a local news station website that a neighbor said that she had come home around 11 p.m. and had heard nothing unusual. I told Mr. Cummings that I strongly felt that the victims autopsy report (mainly time of death) would help prove my son's innocence. Because of those things, I didn't see how any attorney (Public Defender or otherwise) could lose my son's case. At that time, Mr. Cummings told me that he and Assistant State Attorney Jack Campbell had already discussed my son's case. He told me that Assistant State Attorney Jack Campbell was going to be the prosecutor on the case. And that Assistant State Attorney Jack Campbell had told him that if the female victim had been two weeks further into her pregnancy that my son would be facing 3 murder charges. I told Mr. Cummings that I was told by the Public Defender's office that my son's case was in the Conflict Counsel's office. Mr. Cummings then went on to tell me that he handles cases out of the Conflict Counsel's office. He explained to me that there are only a handful of attorneys in the area that are able to handle capital cases out of the Conflict Counsel's office. At that point I thought that Mr. Cummings was letting me know that he could handle my son's case through the Conflict Counsel's office. I figured that since Mr. Cummings had already spoken to Assistant State Attorney Jack Campbell and he handles cases out of the Conflict Counsel's office, I should tell him more about the situation. I began telling him more about my son and how my son and I voluntarily went down to the sheriff's office and they turned on us. I explained to him why I believed the detectives fabricated information in order to charge my son with cultivating mariuana. possession of drug paraphernalia. Most

seriously, of course I told him about how I knew that the two counts of first degree murder were ridiculous charges. I then asked him what was it that I needed to do in order to have the Conflict Counsel's office put him on as my son's attorney. He then explained that due to the selection process, he was not up to take my son's case. He stated that if I wanted him to take the case, then he'd be taking it as a private attorney and that I would have to pay him directly. He said that there were some costs and fees that he could get deferred by filing Indigent on my son's behalf. He said that due to his experience with working with the Conflict Counsel's office, he knows the State's requirements for getting the State to pay for costs and fees. Mr. Cummings quoted me a retainer fee of \$35,000, which was \$10,000 more than what some of the other attorneys had quoted me, but the total cost was the same as the others (\$50,000). I was told early on by an attorney/friend based in Orlando, FL that a case such as my son's could cost as much as \$100,000. I was also told by another attorney that he could file Indigent on behalf of my son, but that a lot of attorneys don't do it for their clients because they don't like to do the paperwork to get reimbursed. So naturally, Mr. Cummings experience to file the necessary paperwork to get the State to pay for some of the costs and fees--sparked my interest. I asked Mr. Cummings if he had a secretary and he answered, no. I was concerned by that because I'd been involved in lawsuits in the past and I know that they are very time consuming. I asked Mr. Cummings if he was familiar with Facebook, because I knew that days before the victims were murdered, the female victim was threatened on Facebook. Also, there was a lot of more information on Facebook that gave me some insight about the victims; including a direct message to me from the female victim herself. Mr. Cummings told me that he was not familiar with Facebook, but his wife was. I didn't really want an attorney that didn't know Facebook, but I wasn't going to let that be my determining factor if I chose to hire a private attorney. Because I knew that I could put Facebook screen shots on CD. I did not retain Mr. Cummings at that time. I again, explained to him that I wanted to wait to speak with whomever the State appointed out of the Conflict Counsel's office on my son's case. I told Mr. Cummings that I'd be in touch.

Over the next four weeks, I continued to call the Public Defender's office to find out who was appointed as my son's attorney. Each time I was told the same thing—"his case was in the Conflict Counsel's office and no attorney has been appointed". Also during this time, Mr. Cummings called me at least once a week (a total of 3 or more times). I explained to him that I was still waiting to hear from the Conflict Counsel's office. On March 9, 2011, Mr. Cummings called me expressing his concerns about the murder charges against my son and told me that my son needed an attorney. We discussed finances and he said that he'd be willing to work with me on that (see email 3/9/11 email verification). At that time my son had been sitting in the Leon County Jail for over 30 days and had not been appointed an attorney. I agreed with Mr. Cummings, my son needed an attorney. I went ahead and retained him. That particular phone conversation was followed by 2 relevant emails: On March 10, 2011 I received a Contract for Authority to Represent and Contract for Services (Which DOES NOT state the accurate charges—charges stated on the Contract is Cultivation of Marijuana, Second Degree Murder and First Degree Murder. The charges that should have been listed are Cultivation of Marijuana, Possession of Drug Paraphernalia, First Degree Murder, First Degree Murder and Possession of Firearm by a Juvenile Delinquent). Mr. Cummings emailed me a copy of the Contract on March 10, 2011 to review. Upon opening the attached Contract, I noticed that the Possession of Firearm by a Juvenile Delinquent was not on there. I replied asking about the missing information but he did not reply (see email 3/10/11).

Mr. Cummings and I met at his office located on Meridian Street on March 12, 2011. At that time I signed a Contract for Authority to Represent and Contract for Services. Nothing in relation stating the charges had been changed. I'm not sure if we discussed it or not. Because I

did not have all of the money as Mr. Cummings and I had previously discussed, he made handwritten changes on the Contract and we both initialed the changes. I forgot to fill in my address, phone number and email address. That information was added by my son when Mr. Cummings went to visit him after our meeting.

On March 23, 2011, I received an email from Mr. Cummings informing me that there had been a case management hearing the previous day March 22, 2011 (see 3/23/11). On August 3, 2012, I got a copy of the **Docket Report on Case Process** (see attached), on 3/21/11 it is noted that Baya Harrison was Conflict Attorney. On 3/22/11 it is noted Private Atty Assigned—Private Attorney Added 309631- Cummings Gregory. Also on 3/22/11 Case Comments from Court Event—Mr. G. Cummings substituted as Private Counsel Waiver of Defendant's presence for future for CMC dates. *In his email dated 3/23/11, Mr. Cummings did not mention anything about a court appointed counsel having already been assigned to my son's case, let alone him substituting counsel. If you will notice, on the Docket Report there is No Mention of a named Conflict Attorney until 3/21/11 after I retained Mr. Cummings. Neither my son nor I met Mr. Baya Harrison. I find it to be unethical for Mr. Cummings to replace Mr. Baya Harrison knowing that Mr. Harrison's client was completely unaware of his appointing.*

On April 7, 2011, I received an email from Mr. Cummings informing me that he had received some of the Discovery regarding my son's case (see 4/7/11). On (see 4/8/11), Mr. Cummings and I are discussing me getting a copy of the Discovery Report and the results of the paternity test to find out if my son was the father of the unborn baby. As you can see in my emails, I am not sure what information is available to me. I'd never dealt with anything in adult criminal court. On (see 4/20/11), I'm simply asking if we should get together—I received No Reply from Mr. Cummings. On (see 4/27/11) I receive email from Mr. Cummings stating that he didn't see my email from (4/20/11) and that he will not be able to meet with me because he was going to PA for a week. On (see 4/28/11), I sent an email to Mr. Cummings asking him to go visit with my son whenever he had the time—No Reply. On (see 5/11/11)—No Reply. Mr. Cummings emailed me on (see 6/21/11) updating me on the case, letting me know that the Depos were set for the week of July 22, 2011 and September 19, 2011—he lets me know that the court date is September 9, 2011 at which time the judge may set a trial date in 2012. In replying to his email on (6/21/11), I asked Mr. Cumming about a \$1000 check that I had wrote to him on 6-1-11 that had not cleared my account. On (6/21/11) his reply was that he would check on it. On (see 6/22/11), Mr. Cummings emailed me letting me know that he did not check on it.—No Reply. On (see 7/16/11) Mr. Cummings emailed me letting me know that Depos were set for Tracy Bush (the victims' mother) and LaShonda Perkins (Tracy Bush's girlfriend). In this email he asked me if I had any questions that I wanted him to ask them and he said that I should please let him know. *At this time Mr. Cummings Had Not provided me with a copy of the Discovery Report as stated in the email dated (4/8/11), so I really didn't know of any hard solid questions to ask. I told Mr. Cummings when I signed the Contract back in March 2011 that I did not know much about the female victim or her family, including the male victim (her brother). After my son was charged with their murders, I turned to Facebook to retrieve a lot of information about them. Facebook is where I learned that the female victim had a current boyfriend and that he was an on again/off again boyfriend and that he thought that he was the father of the unborn baby. I did provided Mr. Cummings with some questions. I would later learn that just about all of the questions that I provided to Mr. Cummings—well the answers were right there in the Discovery Report. I replied on (see 7/17/11) saying ok. On (see 7/19/11) I emailed Mr. Cummings a list of questions to ask Tracy Bush and LaShonda Perkins. On (see 7/20/11) I emailed Mr. Cummings additional questions to be asked.—No Reply. On July 22, 2011 the day of Depos for Tracy Bush and LaShonda Perkins Mr. Cummings emailed me (see 7/22/11) Subiect line: DNA. telling me that DNA paternity test confirmed that the unborn babv was*

DaShon (DeShon) and that two more weeks the state would've charged him with a 3rd count of murder. *I found this type of notification to be very unprofessional because after all despite the female victim wanting an abortion and the issue surrounding that, the murdered unborn baby was confirmed to be my son's child and my grandchild. Mr. Cummings didn't make any mentions as to if he were going to go visit with my son to inform him, so I asked him if he felt that my son should know. By the time he replied (which was hours later), I'd already informed my son. I never did ask Mr. Cumming why he waited until the day that he deposed the victims' mother to inform me about the paternity test. Especially when the paternity test results were in the Discovery Report. In the email dated (4/8/11), he did tell me that he was "not sure yet about paternity test".* On (see 7/29/11) I emailed Mr. Cummings asking about providing me with a copy of the Discovery Report—No Reply. I sent Mr. Cummings two emails on (8/23/11) one was informing him that my son had told me that the victims' mother had come out to the jail to see him but was denied the visitation. And the other email was I'd wanted to reach out to the family but I wasn't for sure if I could get arrested for doing so—No Reply to either of them. On (9/2/11) I emailed Mr. Cummings in regards to a late payment. On (see 9/6/11) I received an email from Mr. Cummings in regards to updates at a case management hearing. He also informs me that the check for \$1000 that I'd written to him was returned for insufficient funds along with a \$10 fee. And he asks me about a CD that he mailed to me containing the Discovery Report. I replied letting Mr. Cumming know that I Had Not received a CD and that I would look into the check issue. *I had not received a CD in the mail. I never received a CD in the mail.* On (see 9/8/11) Mr. Cummings emailed me asking me if we could meet. Not to discuss my son's case but to provide him with a check to replace the one that was returned to him along with the \$10 for the fee. He also asked about the CD that he claimed to have mailed. I replied letting him know that I could meet with him—when and where? And I asked where he had mailed the CD too. He replied that we meet in front of the jail at noon and that he was sure where he'd mailed the CD to my Tallahassee address. On September 9, 2011, I met Mr. Cumming in front of the jail as planned. I explained to him the issue involving the returned check. I did not have the money to replace the returned check but I assured him that I would get the money to him as soon as possible. I also made it clear to him that I would no longer pay him with a personal check instead I'd pay him with money orders. He was ok with that. I asked him about getting a Private Investigator on the case. He said that he wasn't going to do that just yet. He gave me the CD and asked me to get him a paper copy. We discussed a little bit about my son's case. *This was the first time that I'd seen Mr. Cummings since March when I signed the Contract. Mr. Cummings was not going into the jail. He was just passing by the jail on his way to Gadsden County.* On (9/12/11) I emailed Mr. Cummings informing him that I had his copies of the Discovery Report ready. On (9/13/11) Mr. Cummings emailed me apologizing for not responding to my email on 9/12/11. We agreed to meet the morning of 9/14/11 in the parking lot of a shopping plaza on the corner of Capital Circle NE and Park Avenue. Before agreeing to meet there I asked Mr. Cummings why we couldn't just meet at his office. He stated that he didn't like to be at his office because it was a shared office space. When I met with Mr. Cummings on 9/14/11, I told him that the victims Autopsy Report and my son's cell phone records were not in the Discovery Report. Mr. Cummings told me that the victims Autopsy Report was confidential and that he could not share that information with me. He said that he would look into the cell phone records. On (9/22/11) I emailed Mr. Cummings letting him know that I put a cashier's check in the mail for \$2010. On (10/3/11) I emailed Mr. Cummings letting him know that the payment would be late—No Reply. On (10/20/11), I emailed Mr. Cummings apologizing for the late payment. On (10/20/11), He replied ok. On (10/28/11) I emailed Mr. Cummings giving a more detailed explanation as to why October's payment was late. On (10/29/11) Mr. Cummings replied thanking me for updating him. On (11/30/11) I emailed Mr.

Cummings in regards to a payment to be mailed out on 12/2/11. I also informed him that I would go from paying him monthly to paying him \$250 or more a week—still balancing or exceeding \$1000 a month. On (see 2/16/12) I emailed Mr. Cummings asking relevant questions in regards to my son's case; informing him that my son had been asking about him and requesting a time and date to meet. *Mr. Cumming had been my son's attorney now for almost a year. He had only been out to the jail to see my son maybe two times (including the meeting when he first took him on as a client). My son's pre-trial was scheduled for April 5, 2012 and trial set for April 9, 2012. To the knowledge of my son and me, Mr. Cummings had not made contact with his two crucial alibis (his work manager and co-worker whom dropped him off at home after closing the restaurant). Mr. Cummings had not contacted anyone on behalf of my son. My son and I had no idea of what his defense was going to be. My son and I still did not know the time of death of the victims. And no authentic cell phone records had been revealed. Mr. Cummings had not filed a motion to have my son's cell phone records unsealed, if in fact they were sealed. Mr. Cummings had not filed for Indigent on my son's behalf as he said that he would do to defer some of the costs and fees. My son and I had a lot of unanswered questions—Questions that Mr. Cummings could've easily answered.* On (see 2/20/12) Mr. Cummings replied to my email dated 2/16/12 letting me know that he was in trial. *He never answered any of the questions.* On (see 3/5/12) I emailed Mr. Cummings informing him of \$6000 that I was mailing him and what our Contract stated. I also informed him about a lot of information—discrepancies and flat out Lies that was riddled throughout the Discovery Report. Vital information that was sure to be extremely helpful with proving my son's innocence and hastily/wrongful judgment by Leon County Sheriff's detectives to have my 17-year-old son charged, arrested for double (nearly triple) murder and exploited. I also informed him about what I'd been told by someone who was close to the little brother of the victims. And I asked about the upcoming pre-trial hearing. *Although some of my questions may have been basic to Mr. Cummings, my son and I had never been down this path, it was all new to us.* On (3/5/12), Mr. Cummings replied stating that he had received two money orders dated back in February. Most importantly, he stated that my questions (email) prompted him to go through the Discovery again. He states that he read the first 93 pages of the Discovery. Also, he states how he needed a chart of who is who (*referring to one of many pieces of information that I'd been mailing him*). *Mr. Cummings states that he had always been prepared for trial. My son's double murder trial was a month away—Mr. Cummings openly admits that within the people involved in this case he didn't know who is who. Yes, I'd been sending Mr. Cummings a lot of information. I strongly felt like he couldn't have possibly been reading what I was sending him. Because if he was reading it, I thought that he would've laid everything out for us—if he was looking out for my son's best interest. So honestly, I wasn't surprised by his reply about not knowing who was who—how would he know if he's not getting information from my son?* On (see 3/16/12) Mr. Cummings is letting me know that there will be a continuance in my son's trial. He mentions that he's not bothered by the continuance. He states that on March 30, 2012, him, Assistant State Attorney/Prosecutor Jack Campbell and Trentin Ross' attorney—Paul Srylgly are set to depose Ross—stating that Ross' attorney got Ross to agree to come to Tallahassee versus the three of them having to travel to Daytona Beach where Ross now lives. He also states how it will save me the expense of sending him there. *Whoa! Me the expense, one of the reasons that I retained Mr. Cummings was because he told me that he would file the proper paperwork to get costs and fees deferred. So now I'm questioning if he filed for Indigence on behalf of my son.* I'd made a comment about the K-9 dog because my son worked at Taco Bell and supposedly had murdered the victims after he'd gotten off from work, yet the K-9 dog did not pick up his scent—let alone pick up his scent to lead his handler across the street where the car was supposedly parked or to the dumoster within walking distance where the State's "Kev" witness

said he'd drove my son to dispose of the murder weapon that was not found. Lastly, Mr. Cummings states that we can meet for a short time after the hearing. *We always meet for a short time. Mr. Cummings and I have never met for more than an hour. We've only seen each other maybe four times—once in his office and the other times in parking lots-- always having short discussions—usually with me asking questions that he never seemed to answer directly as previously noted.* Also, Mr. Cummings does not mention going to update my son in regards to the new information. In my reply on (3/16/12), I tell him that I will let my son know about the latest. On (see 3/16/12) I reply to Mr. Cummings asking if he had any more information for me to pick a part. On (see 3/17/12) his reply is we can talk Tuesday. On (see 3/18/12) I emailed Mr. Cummings asking if he can go see my son (which I rarely asked Mr. Cummings to go see my son). *Over the course of the year my son asked me on a regular basis to ask Mr. Cummings to come see him. I'd ask my son what about—before I determine if I thought it would be relevant for me to pass the message on. There were times when I told my son to call him. To see if he would respond from a direct request—he Did Not. I used to pacify Mr. Cummings absence by telling my son—no news could mean good news.* On (see 3/19/12) Mr. Cummings replied that he could not go see my son. Also on (3/19/12), Mr. Cummings emailed me stating that he requested for my son to be brought to pre-Trial. On **March 20, 2012**, I met with Mr. Cummings after pre-Trial. We sat in a cafeteria in the courthouse. The first question that I asked Mr. Cummings was if he felt like this case would go to trial. He told me that my son had just asked him the same question in the courtroom. Mr. Cummings stated yes, that the State did have a case to take to trial. I asked Mr. Cummings to explain why he felt like they had a case. He said Trentin Ross. *I found it hard to believe that my son's life hung in the valance of Trentin Ross. I'd spoken to Trentin Ross before they charged my son with the murders—furthermore, his statements are inconsistent, he has more than enough reason to be angry with my son because my son had sex with his white girlfriend—Riley Ewell (although he didn't seem to be angry with my son when my son and I talked to him before he was arrested)* In Riley Ewell's statement she says that Trentin Ross was aware of her and my son's sexual encounter. My son and I always felt that the Leon County Sheriff's detectives either lied about Trentin Ross having made the statement that he (Trentin Ross) drove my son to the victims' residence or they pressured Trentin Ross to make the statement. Either way, my son knows that Trentin didn't drive him to the victims' residence. I know that he didn't drive my son over to the victims' residence—because if he did—he'd be in jail with my son. I asked Mr. Cummings about what legal defense did he plan on presenting, he stated that he wanted to hear what Trentin Ross had to say. I went on to ask about key information in regards to the case and he just didn't seem to have any answers for me. *Mr. Cummings knew that we were going to meet that morning and he didn't have any notes or any relevant information to share with me. He showed me about three poor snapshots of the victims' residence that he had taken on his cell phone.* Mr. Cummings told me that either my son or Trentin Ross was the murderer. *I felt completely opposite. I didn't feel like my son or Trentin Ross had anything to do with the murders. From what I've seen and read, there was no physical evidence pointing to my son or Trentin Ross. And if that were truly the case, then why is Trentin Ross not in jail. Trentin Ross did not spend not one day in jail. He is an adult—my son was a teenager at the time—surely law enforcement will hold him at a higher level of responsibility—the adult admitted driver.* On (see 3/29/12) Mr. Cummings emailed me telling me that the Depo set for Trentin Ross on March 30, 2012 was cancelled due to Trentin Ross not being able to get to Tallahassee. Also, he stated that trial would be reset for August. *Mr. Cummings does not mention anything about informing my son about the latest changes.* On (see 4/5/12) Mr. Cummings emailed me stating that on April 4, 2012 he'd just picked up 26 CDs and 30 DVDs stating that this was in part of the Discoverv. *This trial was set for April 9, 2012*

he's just now getting these CDs and DVDs. Yet, he states that he was ready for trial—based on what? He also informs me that my son's trial has been reset for August. Again, with no mention of meeting or informing my son of the latest. All my son and I ever wanted to know—was what legal defense was Mr. Cummings going to present? On (4/5/12), I replied asking Mr. Cummings about a missing statement that I felt was vital in my son's case. This was the third or fourth time that I'd asked him about this statement. I also expressed my feelings toward a discussion that we'd had in March—after my son's pre-Trial. It was obvious that every time my son's trial date changed, Trentin Ross' trial date for Cultivating Marijuana changed. I mentioned this to Mr. Cummings because this was just too obvious. It raised a red flag with me. I felt like just maybe the State was intimidating Trentin Ross. Mr. Cummings did not address my concerns. I told Mr. Cummings that I would update my son on the latest charges. As far as me updating my son whenever there was a change in his case, I'd wait to see if Mr. Cummings was going to let me know first. But when he didn't—naturally I wanted my son to know what was going on. Besides that, it was now April and I believe Mr. Cummings had only gone out to the jail 2 or 3 times to see my son. Mr. Cummings was not responding to my son's phone calls. At this point, I began to see what a county commissioner, a congresswoman, two senators, pastors, community leaders, and leaders of other special interest groups had been telling me for months—"Greg Cummings is not looking out for your son's best interest". The last thing I wanted to do was tell my son to fire Greg Cummings. I'd invested a lot time and money in him. For the entire month of May, Mr. Cummings did not make contact with my son or me. My son told me that one day he saw Mr. Cummings at the jail visiting an inmate and that he got his attention. He asked Mr. Cummings for a visit and he came back the next day to visit him. I believe this was in June 2012. He said that Mr. Cummings was still just leaving everything up to what Trentin Ross was going to say. I had not heard anything from Mr. Cummings since early April (the exchange of emails as noted). I stopped making monthly payments to Mr. Cummings. On (see 7/8/12) Mr. Cummings emailed me asking me to make a copy of the Discovery CD (I'm assuming he wanted me to print it out) it was the same Discovery CD he'd given to me back in September 2011 so that he can get it to my son. Why? I'd already brought it to Mr. Cummings attention that the Discovery Report on the CD that he provided to me Did Not have all of the information on it. Clearly, the Discovery Report on the CD had been manipulated because although the page numbers were in consecutive order—sections were missing. As my son's attorney, why did Mr. Cummings provide me (the mother/ contract signee/ payer) with a manipulated copy of the Discovery Report that excluded vital information? Why does Mr. Cummings want to provide my son (his own client) with a manipulated copy of the Discovery Report that excluded information? Furthermore, why is Mr. Cummings CD different from the one he provided to me? I replied ok but I did not send him anything. He stated that he'd call in the next few days. He Did Not call. My son's next case management was scheduled for July 17, 2012, Mr. Cummings emailed me on (see 7/16/12) He states that he found my emails in his junk email (this was not the first time he stated that—he was aware that my emails were going into his junk email—so then he should've been skimming through his junk email as frequently as he checked his regular email). He was also letting me know about the case management hearing on July 17, 2012 (the next day). On (7/16/12) I replied letting Mr. Cummings know that I'd told my son not to speak to him. I again asked him for a copy of the victims' autopsy report (as noted early he'd stated that they were confidential—well I was told that nothing in this case should be confidential from me or my son). On (7/16/12) Mr. Cummings replied with an attachment of a manipulated copy of the autopsy report of only the female victim (9 pages). Not to include an estimated time of death of the victim. On (7/16/12) I replied reminding Mr. Cummings that my son is sitting in jail for murdering 2 people and that I needed the autopsy report for the male victim. On (see 7/18/12) Mr. Cummings emailed me an attachment of a single page of the female victim's autopsy

report. Then he emailed me an attachment of a manipulated copy of the autopsy report for the male victim (4 pages). *Although Mr. Cummings Did Not send me complete copies of the victims autopsy reports, from my research, the information on the pages that he sent to me was enough information to confirm what I had stated all along-- that there was no way that my son could've murdered the victims. It was no longer my thoughts and my opinion—it is Scientific Evidence. According to an eyewitness and the mother of the victims' statements, as well as, the time of the female victim's last cell phone activity (which was a text message to my son at 10:59 p.m.) and the crime scene report—there's just no way that my son was their murderer. He was over 16 miles away at work without transportation. When I brought this to Mr. Cummings' attention he disputed it. On (7/18/12) Mr. Cumming replied disputing my information. He also states that there were "hot dogs on the counter". According to the crime scene report that I read in the Discovery Report, there was no mention of "hot dogs on the counter". However, there was a mention of hot dogs in a bag being outside the front door on the ground. These hot dogs were being brought to the residence by the mother with the younger brother carrying them and then having dropped (?) them right outside the front door the morning of the victims being discovered. So my thoughts would be that if the hot dogs were moved from outside on the ground to inside on the counter, then the crime scene had been tampered with.* Mr. Cummings then goes on to say how I can't fire him; my son and he still talk regardless; he told my son that he will continue to represent him even if I don't pay him; and how he didn't say anything negative about me; his concern for my son; and then he talks about his good reputation in the judicial system. I did not reply to Mr. Cummings email. On (7/18/12) Mr. Cummings tells me that Trentin Ross' depo was to have been taken that day but was cancelled. Within the same email he replies to an email that I sent to him on April 26, 2012. He states that he will go to the jail to meet with my son every 2 weeks, video conference him and keep me posted. He then gives an explanation of the "games" that Jack Campbell is playing with Trentin Ross and Trentin Ross' family. I did not reply. On (7/18/12) Mr. Cummings asks me to let my son know that he was having problems with his video and would not be able to pull him up. I did not reply. On (see 7/19/12) Mr. Cummings emailed me two times additional attachments of the male victim's autopsy report. I did not reply. On (see 8/20/12) Mr. Cummings emailed me letting me know about my son's latest charge of Solicitation to Commit Murder. He explained what he knew about it, stated that I'm not a suspect in the offense, because supposedly I was supposed to have supplied the "Hitman" with a copy of Trentin Ross' picture off of Facebook. He also said that my son couldn't have any visitors other than an attorney. On (8/20/12) Mr. Cummings emailed me a copy of the Probable Cause in regards to the Solicitation to Commit Murder charge against my son. I did not reply. On (see 8/21/12) Mr. Cummings emailed me letting me know that he was no longer on my son's case; that it would probably go to Public Defender's or Conflict Counsel's office; that he spoke with my son; and that if I have any questions that I can call him. *Mr. Cummings was more attentive to my son after I'd told him not to talk to him than he ever was over the year and nearly a half of him being his client.*

The whole "Hit man" and Facebook mess that they say they have my son caught up in-- well, that was one of the situations that the female victim and her best friend were caught up in. And Leon County Sheriff's office just seemed to sweep it under the rug. According to the Discovery Report, the best friend posted on Facebook that she "got a hit out on this bitch" just a day or so before her and her brother were found murdered. There are about 20 or more perpetrators in this case. Of all of them my son was the only one who was enrolled in college and working 35 or more hours a week. At the beginning of this murder investigation, Leon County Sheriff's detectives did not know who the main target was. It was rumored that the male victim was in a gang. My son may have told people that he was in a gang, but he was not in a gang. I never witnessed any gang activity. Also, my son's stint under the Juvenile Supervision/Probation

Conditions in 2009-10—it was never recommended that he participate in any Anti-Gang Program. He was not a documented gang member. But Mr. Cummings has done nothing to discredit that. After my son's pre-Trial on March 20, 2012, Mr. Cummings told me that the State decided not to bring up the "gang" issue or Facebook. I disagreed with that because I knew that they could not make my son a gang member and on Facebook, well, the female victim used it like a diary and that's where her best friend stated that she had a "Hit out on this Bitch" so I didn't think that to overlook that was a good idea. Also, before my son was charged (when my son and I voluntarily went down to the sheriff's office, Detective Dennis told me that several people had told her that my son was being ugly toward the female victim on Facebook. I knew that was not true. Detectives reference Facebook in the Probable Cause—but now the State doesn't want to discuss it at trial. And that's all because they can't find nowhere in Facebook where my son was being ugly toward the female victim. Detectives tried to create a hostile environment between my son and the female victim---and it's just all coming back to haunt them.

For a year and a half I've honestly felt like I'm babysitting grown folks. I still feel like I'm babysitting grown folks. I was paying Mr. Cummings and trying my best to assist him in any way that I could. Florida Bar File No. 2013-00,124
wasn't for my son. I would be lost. See email below. I did not get a response.

p. 13 -what? If it

- DeShon Thomas

7/12/12

CARISSA CHAMBERS

ccari27@hotmail.com

To Greg Cummings

From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Thu 7/12/12 5:49 PM

To: Greg Cummings (gregcummings@fairpoint.net)

Is there a problem that I'm unaware of-- because I'm really not getting respectable/ timely responses from you? If for some reason you've lost interest in his case, please--let's get together and settle whatever so that I can get another attorney. I understand that getting another attorney will delay his trial date--but like all of the other delays--the option is the same. Once again please let me know something. And if you we have to have that discussion, please let me know what my refund amount will be.

Thanks

Sent via BlackBerry from T-Mobile

Still Standing Strong,

Ms. Carissa Chambers

Enclosures (Formal Rebuttal, Sent/Received Emails)

cc: Gregory Cummings

*Email Log

Incoming/ Outgoing Emails 3/9/11 through 8/21/12

Greg Cummings			
Arrange ▼	Date		
Gregory J. Cummings		Deshon Update	8/21/12
Gregory J. Cummings		Probable Cause for Solicitation	8/20/12
Gregory J. Cummings		Deshon's recent arrest	8/20/12
Gregory J. Cummings		SC page 7 try again	7/19/12
Gregory J. Cummings		SC pages 3 5&7no idea why not going through	7/19/12
Gregory J. Cummings		One other item	7/18/12
Gregory J. Cummings		Response	7/18/12
Gregory J. Cummings		Re: FYI	7/18/12
Gregory J. Cummings		Re: Tomorrow	7/18/12
Gregory J. Cummings		SC 7 PAGES	7/18/12
Gregory J. Cummings		Re: Tomorrow	7/18/12
Gregory J. Cummings		Page 7	7/18/12
Gregory J. Cummings		Re: Tomorrow	7/17/12
CARISSA CHAMBERS		RE: Tomorrow	7/16/12
Gregory J. Cummings		Autopsy	7/16/12
Gregory J. Cummings		Tomorrow	7/16/12
CARISSA CHAMBERS		DeShon Thomas NR = No Reply	7/12/12
CARISSA CHAMBERS		?? DeShon Thomas NR	7/10/12
CARISSA CHAMBERS		DeShon Thomas NR	7/09/12
CARISSA CHAMBERS		Re: Discovery for Deshon	7/08/12
Gregory J. Cummings		Discovery for Deshon	7/08/12
CARISSA CHAMBERS		DeShon Thomas// Questions for Trentin Ross NR	7/05/12
CARISSA CHAMBERS		DeShon Thomas NR	6/22/12
CARISSA CHAMBERS		??? NR	5/01/12
CARISSA CHAMBERS		FYI NR	4/26/12

Sent From Mr. Cummings

After I told my son to stop talking/FIRE

Γ	CARISSA CHAMBERS	Please read at your convenience	4/05/12
Γ	CARISSA CHAMBERS	Re: Update CDs and DVDs	4/05/12
Γ	Gregory J. Cummings	Re: Update CDs and DVDs	4/05/12
Γ	CARISSA CHAMBERS	Re: Update CDs and DVDs	4/05/12
Γ	Gregory J. Cummings	Update CDs and DVDs	4/05/12
Γ	CARISSA CHAMBERS	Re: Update	3/29/12
Γ	Gregory J. Cummings	Update	3/29/12
Γ	CARISSA CHAMBERS	Text messages <i>NR</i>	3/26/12
Γ	CARISSA CHAMBERS	Det. Melinda McBride's interview <i>NR</i>	3/26/12
Γ	CARISSA CHAMBERS	Florida Statute 790.22 <i>NR</i>	3/24/12
Γ	CARISSA CHAMBERS	Fw: FYI	3/23/12
Γ	CARISSA CHAMBERS	FYI	3/23/12
Γ	CARISSA CHAMBERS	Re: Pre-Trial	3/19/12
Γ	Gregory J. Cummings	Re: Pre-Trial	3/19/12
Γ	CARISSA CHAMBERS	Re: Pre-Trial	3/19/12
Γ	Gregory J. Cummings	Re: Pre-Trial	3/19/12
Γ	CARISSA CHAMBERS	Re: Pre-Trial	3/18/12
Γ	Gregory J. Cummings	Re: Pre-Trial	3/17/12
Γ	CARISSA CHAMBERS	Re: Pre-Trial	3/16/12
Γ	Gregory J. Cummings	Re: Pre-Trial	3/16/12
Γ	CARISSA CHAMBERS	Re: Pre-Trial	3/16/12
Γ	Gregory J. Cummings	Re: Pre-Trial	3/16/12
Γ	CARISSA CHAMBERS	Pre-Trial	3/16/12
Γ	CARISSA CHAMBERS	Mailed Info <i>NR</i>	3/08/12
Γ	CARISSA CHAMBERS	Re: DeShon acct	3/05/12
Γ	Gregory J. Cummings	Re: DeShon acct	3/05/12
Γ	CARISSA CHAMBERS	Re: DeShon acct	3/05/12

Γ	Gregory J. Cummings	Re: DeShon acct	3/05/12
Γ	CARISSA CHAMBERS	DeShon acct	3/05/12
Γ	CARISSA CHAMBERS	Re: ??	2/20/12
Γ	Gregory J. Cummings	Re: ??	2/20/12
Γ	CARISSA CHAMBERS	??	2/16/12
Γ	CARISSA CHAMBERS	Depositions	1/17/12
Γ	CARISSA CHAMBERS	?? <i>NR</i>	12/19/11
Γ	Gregory J. Cummings	<u>Re: payment</u>	11/30/11
Γ	CARISSA CHAMBERS	<u>payment</u>	11/29/11
Γ	CARISSA CHAMBERS	<u>fyi--interesting</u> <i>NR</i>	11/12/11
Γ	Gregory J. Cummings	<u>Re: FYI</u>	10/29/11
Γ	CARISSA CHAMBERS	<u>FYI</u>	10/28/11
Γ	Gregory J. Cummings	<u>Re: FYI--Oct Pymt</u>	10/20/11
Γ	CARISSA CHAMBERS	<u>FYI--Oct Pymt</u>	10/20/11
Γ	CARISSA CHAMBERS	<u>October pymt</u>	10/03/11
Γ	CARISSA CHAMBERS	<u>RE: Paperwork</u>	9/22/11
Γ	CARISSA CHAMBERS	<u>LH</u>	9/21/11
Γ	CARISSA CHAMBERS	<u>LH</u>	9/21/11
Γ	CARISSA CHAMBERS	<u>LH</u>	9/21/11
Γ	gregorycummings	<u>Paperwork</u>	9/13/11
Γ	CARISSA CHAMBERS	<u>Re: Paperwork</u>	9/13/11
Γ	Gregory J. Cummings	<u>Paperwork</u>	9/13/11
Γ	CARISSA CHAMBERS	<u>Discovery</u>	9/12/11
Γ	CARISSA CHAMBERS	<u>Re: Meeting tomorrow?</u>	9/08/11
Γ	Gregory J. Cummings	<u>Re: Meeting tomorrow?</u>	9/08/11
Γ	CARISSA CHAMBERS	<u>Re: Meeting tomorrow?</u>	9/08/11
Γ	Gregory J. Cummings	<u>Meeting tomorrow?</u>	9/08/11
Γ	CARISSA CHAMBERS	<u>FYI</u> <i>NR</i>	9/06/11

Γ	CARISSA CHAMBERS	<u>Re: Update</u>	9/06/11
Γ	gregorycummings	<u>Update</u>	9/06/11
Γ	CARISSA CHAMBERS	<u>Late Payment</u> <i>NR</i>	9/02/11
Γ	CARISSA CHAMBERS	<u>Tracy Bush</u> <i>NR</i>	8/23/11
Γ	CARISSA CHAMBERS	<u>???</u> <i>NR</i>	8/23/11
Γ	CARISSA CHAMBERS	<u>Re: DNA</u>	7/29/11
Γ	CARISSA CHAMBERS	<u>Re: DNA</u>	7/22/11
Γ	CARISSA CHAMBERS	<u>Re: DNA</u>	7/22/11
Γ	CARISSA CHAMBERS	<u>additional questions</u> <i>NR</i>	7/20/11
Γ	CARISSA CHAMBERS	<u>Deko Questions</u> <i>NR</i>	7/19/11
Γ	CARISSA CHAMBERS	<u>FW:</u> <i>NR</i>	7/18/11
Γ	CARISSA CHAMBERS	<u>(No Subject)</u> <i>NR</i>	7/18/11
Γ	CARISSA CHAMBERS	<u>RE: Depos</u>	7/17/11
Γ	Gregory J. Cummings	<u>Depos</u>	7/16/11
Γ	CARISSA CHAMBERS	<u>RE: Update</u>	6/29/11
Γ	CARISSA CHAMBERS	<u>Re: Update</u>	6/22/11
Γ	gregorycummings	<u>Re: Update</u>	6/22/11
Γ	CARISSA CHAMBERS	<u>Re: Update</u>	6/21/11
Γ	gregorycummings	<u>Re: Update</u>	6/21/11
Γ	CARISSA CHAMBERS	<u>Re: Update</u>	6/21/11
Γ	gregorycummings	<u>Update</u>	6/21/11
Γ	CARISSA CHAMBERS	<u>FYI--DeShon Thomas</u> <i>NR</i>	5/11/11
Γ	CARISSA CHAMBERS	<u>Message: DeShon Thomas</u> <i>NR</i>	4/28/11
Γ	CARISSA CHAMBERS	<u>Re: Following up-- DeShon Thomas</u>	4/27/11
Γ	Gregory J. Cummings	<u>Re: Following up-- DeShon Thomas</u>	4/27/11
Γ	CARISSA CHAMBERS	<u>Re: Following up-- DeShon Thomas</u>	4/27/11
Γ	Gregory J. Cummings	<u>Re: Following up-- DeShon Thomas</u>	4/27/11

Γ	CARISSA CHAMBERS	<u>Following up-- DeShon Thomas</u>	4/27/11
Γ	CARISSA CHAMBERS	<u>FYI</u> <i>NR</i>	4/20/11
Γ	CARISSA CHAMBERS	<u>Re: Re:</u>	4/08/11
Γ	Gregory J. Cummings	<u>Re: Re:</u>	4/08/11
Γ	CARISSA CHAMBERS	<u>Re:</u>	4/08/11
Γ	CARISSA CHAMBERS	<u>Re:</u>	4/08/11
Γ	Gregory J. Cummings	<u>Re:</u>	4/08/11
Γ	CARISSA CHAMBERS	<u>(No Subject)</u>	4/08/11
Γ	CARISSA CHAMBERS	<u>Re: Discovery</u>	4/07/11
Γ	CARISSA CHAMBERS	<u>Re: Discovery</u>	4/07/11
Γ	CARISSA CHAMBERS	<u>FYI--mailed CD</u> <i>NR</i>	3/24/11
Γ	CARISSA CHAMBERS	<u>Re: Update</u>	3/23/11
Γ	CARISSA CHAMBERS	<u>Facebook Summary Outline</u> <i>NR</i>	3/14/11
Γ	CARISSA CHAMBERS	<u>RE: Contract</u>	3/11/11
Γ	CARISSA CHAMBERS	<u>Re: Contract</u>	3/10/11
Γ	CARISSA CHAMBERS	<u>RE: Email address verification</u>	3/09/11

• Re: DeShon acct
To Greg Cummings
From: **CARISSA CHAMBERS** (ccari27@hotmail.com)
Sent: Mon 3/05/12 9:05 PM
To: Greg Cummings (gregcummings@fairpoint.net)
I figured no one had sent anything. Anyway, I just mailed the chart to you on Saturday (3-3-12) so will more than likely get it tomorrow. Yes, I followed the discovery from the CD that you provided to me. I've read it several times. I have the info. broken down almost like a line item budget (by page and paragraph). After re-reading it so many times-- some of the BS that I'd missed the first couple of times just started jumping off of the pages at me. I can just about go directly to a lot of the stuff. There's about 30 pages of nearly repetitive info (in my opinion) in the FDLE Transaction Archive Report. I'll mail you a copy of my breakdown/ outline.

I saw where Trentin Ross' court date for the cultivating marijuana charge etc. has been rescheduled. It was originally scheduled for sometime in February--it's been rescheduled for April 25th--I believe.

Keep in touch.
Sent via BlackBerry from T-Mobile

2nd
-----Original Message-----
From: "Gregory J. Cummings" <gregcummings@fairpoint.net>
Date: Tue, 6 Mar 2012 01:00:54
To: <ccari27@hotmail.com>
Subject: Re: DeShon acct

Reply
From
Greg
I have received nothing from anyone else. I have here two postal money orders dated 2-14 for \$1,000 and 2-15 for \$250. I guess I better deposit those this week.

After reading this email I decided to go through the discovery again. I always reread it entirely the week before a trial but I figured I'd do it now and the week before in an attempt to answer all your questions. You must have read my mind. I read the first 93 pages then went to the post office thinking I need a chart of who is who as my notes are all over the place. Behold, what appears in my POBox...Thanks. Will call later this week.

Greg

1st
Sent
To
Greg
On Mar 5, 2012, at 11:39 AM, CARISSA CHAMBERS wrote:
> Good morning--I was wondering if you have received a cashier's check from anyone? I have a cashier's check for you in the amount of \$5000.00 and a money order for \$1000.00. According to our contract on March 1st I was supposed to make a balloon payment of \$13000.00. Of course March 1st has come and gone. As far as \$13000.00 is concerned I'm \$7000.00 short. If you haven't received a cashier's check from anyone else--then that's just one of many family members who have said that they'd help financially and didn't so...The question is where do we go from here? Do you feel like the state will take this case to trial?
> From what I've gathered there's more than enough reasonable doubt present. Aside of that the detectives reports are contradicting, plenty of administrative errors-- there's a search warrant that was signed by a judge dated before there was a crime scene, there's sworn documents without signatures (?), lies in both the Probable Cause to warrant the search to get the search warrant and lies in the Probable Cause to charge DeShon. LCSO has events taking place on wrong days, wrong address for the crime scene; LCSO claims DeShon committed the murders after he'd gotten off from work--well he worked at Taco Bell so the K9 dog would've easily been able to pick up his scent and lead LCSO directly to the dumpster at the Family Dollar which is within walking distance to Laqecia's residence. Did I read correctly--do LCSO have DeShon's cell phone records sealed? Do you know that Detective Odham has been fired from LCSO, Couch

left LCSO but before he left Sheriff Larry Campbell was going to file a complaint against him; Lakisha Snow (Crime Scene Unit) and Tim Lawrence had complaints filed against them that was sent to Internal Affairs?

> I went over the Discovery report and broke it down just about line by line. I mailed you charts showing everyone's affiliation. I have more information to mail to you. Wildly--I was talking to this near stranger about this case without mentioning names in our conversation. This near stranger asked me the names of the people murdered--when I told him--he immediately knew who I was talking about and he'd been told about the situation. He told me that he'd just spent time with Ronterrious and he told me that the murders had something to do with Ronterrious and Sterling in regards to fake money (which is also in the Discovery). I didn't mention anything to this near stranger about Ronterrious--let alone fake money so...

> Should we meet before pre-trial? Is DeShon going to be at pre-trial? Should I plan to be there?

> Sent via BlackBerry from T-Mobile

??

CARISSA CHAMBERS

To Greg Cummings

From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Thu 2/16/12 2:02 PM

To: **Greg Cummings** (gregcummings@fairpoint.net)

Hope all is well. I've been reading ALL of the Discovery and I noticed that in the section Crime Scene (Entry Control Log and Property Receipts) there is an entry on page 460 indicating that there was an interview of Sandra Walker (LeDeidra Jenkins' mom) signed off by Detective Odham. Do you have a paper copy of Sandra Walker's interview? Because it's not on the disc that you gave me. And if I'm not mistaken p. 460 is the only place that references her directly. I found out that she was once summoned in regards to check fraud or something like that. Also, Alvin Jenkins (LeDeidra's cousin) served time in prison for carrying a concealed weapon 9mm and possession of cocaine.

Will you go ahead and set a time and date for us to get together so that we can discuss this case? DeShon has been asking about you but my response has been the same. Did you receive a cashier's check from anyone yet? Yesterday I put 2 money orders totaling \$1250 in the mail.

I look forward to hearing from you soon. Have a great day!

Sent via BlackBerry from T-Mobile

• Depositions

1/17/12

CARISSA CHAMBERS

ccari27@hotmail.com

To Greg Cummings

From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Tue 1/17/12 8:25 AM

To: **Greg Cummings** (gregcummings@fairpoint.net)

Good morning,

Will you give me a copy of the depositions that you've already taken? Do you plan on or have you already taken anymore since you've taken the police officers? Thanks

Sent via BlackBerry from T-Mobile

• Depos

7/16/11

Greg Cummings

gregcummings@fairpoint.net

To CI L Thomas Deshon

From
Greg

see page 3

From: **Gregory J. Cummings** (gregcummings@fairpoint.net)
Sent: Sat 7/16/11 8:20 AM
To: CI L Thomas Deshon (ccari27@hotmail.com)

Ms. Chambers: Depos are set for Tracy Bush and Lashonda Perkins next Friday. If there are any questions you feel need to be asked of them please let me know. However, this does not guarantee they will be asked or asked in the same form or context.

Greg

Gregory J. Cummings
Attorney at Law

• Re: Discovery

4/07/11

CARISSA CHAMBERS

• ccari27@hotmail.com
To Gregory J. Cummings
From: **CARISSA CHAMBERS** (ccari27@hotmail.com)
Sent: Thu 4/07/11 10:28 AM
To: Gregory J. Cummings (gregcummings@fairpoint.net)
Ok thanks
Sent via BlackBerry from T-Mobile

-----Original Message-----

From: "Gregory J. Cummings" <gregcummings@fairpoint.net>
Date: Thu, 7 Apr 2011 14:01:21
To: <ccari27@hotmail.com>
Subject: Discovery

I have received some of the discovery in the case. However, the state is now sending the discovery on a cd. In this case the discovery is 493 pages. I need to review it and have it printed out. For the past 30 years the state has provided discovery in paper form and then I have copies made of it. I will be in touch when I find out who can print all this stuff. I will be trying Kinkos first.

Greg
Gregory J. Cummings
Attorney at Law

Re: Update

3/23/11

CARISSA CHAMBERS

To Gregory J. Cummings
From: **CARISSA CHAMBERS** (ccari27@hotmail.com)
Sent: Wed 3/23/11 9:49 AM
To: Gregory J. Cummings (gregcummings@fairpoint.net)
Thank you so much.
Sent via BlackBerry from T-Mobile

-----Original Message-----

From: "Gregory J. Cummings" <gregcummings@fairpoint.net>
Date: Wed, 23 Mar 2011 13:05:48
To: <ccari27@hotmail.com>
Subject: Update

There was a case management yesterday. This is only to advise the judge as to the status of the case and to get an idea of how much time is needed before the next court date. Deshon was there and I spoke with him briefly. The next case management is in June. The state has yet to receive all the materials from law enforcement. I expect to start receiving information within the next two weeks. If you have any questions

see page 4

please feel free to contact me.

Greg
Gregory J. Cummings
Attorney at Law

• **Re: Meeting tomorrow?**

9/08/11

CARISSA CHAMBERS

To Greg Cummings

From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Thu 9/08/11 5:54 PM

To: Greg Cummings (gregcummings@fairpoint.net)

Ok--noon is fine.

Sent via BlackBerry from T-Mobile

-----Original Message-----

From: "Gregory J. Cummings" <gregcummings@fairpoint.net>

Date: Thu, 8 Sep 2011 21:47:22

To: <ccari27@hotmail.com>

Subject: Re: Meeting tomorrow?

Noon at the front of the jail. I'm in my car cannot remember the address. I'm sure it was the tallahassee address. I'll bring another one with me.

Gregory J. Cummings

On Sep 8, 2011, at 5:16 PM, "CARISSA CHAMBERS " <ccari27@hotmail.com> wrote:

> Yes--we can meet. What time tomorrow? When/what address did you mail the disc to? I did not receive it.

> Sent via BlackBerry from T-Mobile

>

> -----Original Message-----

> From: "Gregory J. Cummings" <gregcummings@fairpoint.net>

> Date: Thu, 8 Sep 2011 21:10:10

> To: <ccari27@hotmail.com>

> Subject: Meeting tomorrow?

>

> Ms. Chambers: Are you able to meet me tomorrow around noon? I need for you to provide a new check for the one that bounced plus \$10.00 for the fee my bank charged me. Also, I need a set of the copies of the discovery from the disc I sent to you. I need them for the depositions set for the 19th.

> Begin forwarded message:

>

>> From: gregorycummings <gregorycummings@me.com>

>> Date: September 8, 2011 4:54:46 PM EDT

>> To: Gregory Cummings <gregcummings@fairpoint.net>

>> Subject: Fwd: Update

>>

>> Gregory J. Cummings

>>

>> Begin forwarded message:

>>

>>> From: CARISSA CHAMBERS <ccari27@hotmail.com>

>>> Date: September 6, 2011 12:19:42 PM EDT

>>> To: gregorycummings <gregorycummings@me.com>

>>> Subject: Re: Update

>>> Thanks--I'll look into it.

>>> Sent via BlackBerry from T-Mobile

>>> -----Original Message-----

>>> From: gregorycummings <gregorycummings@me.com>

>>> Date: Tue, 6 Sep 2011 13:12:01

>>> To: <ccari27@hotmail.com>

See page 5

>>> Subject: Update
>>> At case management this morning the case was passed until Nov 8. At that time I expect to set a trial date in March or there about. More depositions are set for the week of 9-19. When I got back yesterday I had a lot of mail. One was from my bank indicating your last check did not clear. Please advise.
>>> Did you get the disc with the discovery and get copies made yet? Please advise.
>>>
>>> Thanks.
Gregory J. Cummings

• Re: FYI

7/18/12

Greg Cummings
gregcummings@fairpoint.net

2nd
Note
Date
of
Reply

To CARISSA CHAMBERS
From: **Gregory J. Cummings** (gregcummings@fairpoint.net)
Sent: Wed 7/18/12 6:01 PM
To: CARISSA CHAMBERS (ccari27@hotmail.com)

TR Depo was to be taken today. I called his attorney last week to inquire if all was set. He got back to me Monday night and left only a message to call him and I talked to him before court. However, on Tuesday I was told by his attorney he could not make it because of his work schedule and we would have to go there to depose him. His attorney does not want to make the trip because it would take an entire day and because I believe he will not get paid for it.

So, the Depo was reset for 8-10 here in Tallahassee with Jack Campbell going to talk to his parents and trying to convince them to him come up here that was what I knew before court yesterday. Now that the case is set for October I'm not sure what will happen on the 10th.

I will keep you posted. Really. I will make a concerted effort to keep lines of communication open with the both of you. I told Deshon I would see him every two weeks give or take a few days. And I will.

Yes TR will get a better deal than he would have normally if he "testifies consistently" with his past statements. That is the term routinely used in this line of work. At trial the state will make a big deal of "No deals have been made" no threats or promises but the jury will get the idea of what is hanging over his head and the continuances of his case...

On Apr 26, 2012, at 3:53 PM, CARISSA CHAMBERS wrote:

1st
Note
Date
Sent

> Yesterday Trentin Ross was due in court for cultivating marijuana and possession of drug paraphernalia. However, his case was rescheduled for the last week of August.
>
> I'm not surprised by this because each time DeShon's case has been rescheduled Trentin Ross' case gets rescheduled--always dated afterwards. I believe Trentin Ross' 1st court date was set for sometime in Jan or Feb before it was rescheduled for April 25th which would've been after DeShon's trial had he gone to trial on April 9th as originally scheduled. Seems to me like a deal may be in the making for Trentin Ross' testimony in DeShon's case.
>
> Any idea of when you'll be taking Trentin Ross' deposition?
>
> Thanks
> Sent via BlackBerry from T-Mobile

- DeShon Thomas

7/12/12

CARISSA CHAMBERS
ccari27@hotmail.com

To Greg Cummings
From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Thu 7/12/12 5:49 PM

To: Greg Cummings (gregcummings@fairpoint.net)

Is there a problem that I'm unaware of-- because I'm really not getting respectable/timely responses from you? If for some reason you've lost interest in his case, please--let's get together and settle whatever so that I can get another attorney. I understand that getting another attorney will delay his trial date--but like all of the other delays--the option is the same. Once again please let me know something. And if you we have to have that discussion, please let me know what my refund amount will be.

Thanks

Sent via BlackBerry from T-Mobile

• Text messages

3/26/12

CARISSA CHAMBERS

ccari27@hotmail.com

To Greg Cummings

From: **CARISSA CHAMBERS** (ccari27@hotmail.com)

Sent: Mon 3/26/12 12:37 PM

To: Greg Cummings (gregcummings@fairpoint.net)

Are DeShon's cell phone records sealed? If so--have you seen them. The documents that LCSO is trying to pass off as cell phone records are their own interpretation of DeShon's records. There are a lot of inconsistencies with the cell phone documentation. For instance, the first 3 text messages on LCSO document of transcription for DeShon's cell phone info does not appear on Laqecia's cell phone. There are also texts that has her answering questions to DeShon before he has asked the question. Also, keep in mind that Trentin had access to all of DeShon's personal things--and he had access to DeShon's cell phone after DeShon had come home and fallen asleep on the couch. Trentin and Riley Ewell (Trentin's girlfriend) could've worked on this together. Riley and Trentin went down to LCSO on Feb. 4, 2011(7 days after Trentin had turn his cell phone over to LCSO) to give statements. The language in the Probable Cause is not DeShon's language--not even when he's trying to be funny.

So really I wasn't being sarcastic or naive when I asked you if DeShon's case is going to trial. From what I've read--their own info is flawed. You've been to the crime seen (I went back out there last week)--there's a hill that aligns just about the whole backside of Laqecia's residence. There's no way DeShon could've climbed or walked over that hill without disturbing more of the ground (at least leading up the hill). Personally, I was in Reserve Officer Training Corp when I was in high school and college, we did field activities in the woods that taught us what to look for on the ground that would alert us to whether or not someone had been walking in the area etc.

Sent via BlackBerry from T-Mobile

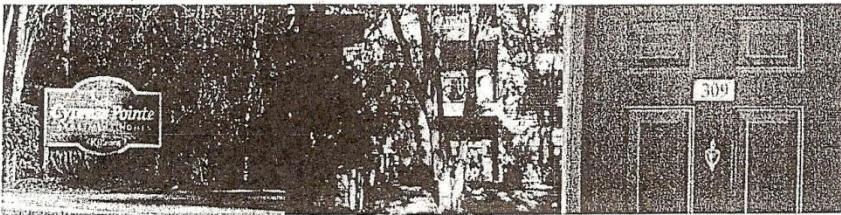
Item A:1

AFFIDAVIT FOR SEARCH WARRANT

IN THE COUNTY COURT
IN AND FOR LEON COUNTY
STATE OF FLORIDA
COUNTY OF LEON

BEFORE ME, the undersigned Judge of the County Court in and for LEON County Florida, personally came, **Detective Melinda McBride**, who, being first duly sworn, deposes and says: That Affiant is a citizen and resident of LEON County, Florida, and that he/she has reason to believe and does believe that certain evidence, more particularly described herein below is being kept in or upon 1555 Delaney Drive, Apt 309, located in LEON COUNTY, Florida, described as follows, to-wit:

This is the residence to be searched:



The residence to be searched is located within the Cypress Pointe Apartment Complex. It is located in the third building on the north side of the complex, when entering from Delaney Drive. The building is an off-white colored building with green trim. The building has the numerics "301-324" on the front of it. The particular residence to be searched is located at the top of the second stairwell from the west side of the building. The residence is on the third floor of the apartment building. The door to the residence faces east. The door is green, with the numerals "309" on the door.

Being the **residence** occupied by or under the control of Trenton Ross and there is being kept on or in said **residence** certain **PROPERTY**, TO-WIT: firearms or any items or accessories associated with a firearm, clothing, any items with trace evidence, any computers or electronic devices which would store any data such as digital images, videos, co-conspiritor contact information and other incriminating data, any documentation written or electronic, receipts, etc. to establish mode of travel prior to/during/after incident which is being kept and used in violation of the Laws of the State of Florida, or evidence of a crime to wit the law prohibiting Homicide, contrary to Chapter 782, Florida Statutes.

000116

Item A: Cont. 2

AFFIDAVIT FOR SEARCH WARRANT

PROBABLE CAUSE

On Thursday, January 27, 2011, Laqecia Herring and her juvenile brother, Sterling Conner were found dead inside their home located at 1740 Corey Wood Circle in Tallahassee, Florida.

Through interviews with family members, it was determined that Deshon Thomas and Laqecia attended middle school together. Approximately seven months ago, Deshon and Laqecia began talking and started a relationship. About a month into their relationship, Laqecia realized she was pregnant.

When Laqecia informed Deshon of her pregnancy, he offered to, and gave her approximately \$140.00 to go to a location at Cross Creek in Tallahassee, so Laqecia could start the abortion process. It was reported Laqecia changed her mind and decided to not carry out the abortion. When the decision was made by Laqecia to not follow through with the abortion, Deshon decided not to have her as a friend on his face book site and stopped talking to her altogether.

According to family, Deshon and Laqecia began talking again approximately two weeks ago, and through their conversations Deshon learned that Laqecia and her family were getting ready to move to Jacksonville, Florida.

On Tuesday night, January 25, 2011, Deshon went to Laqecia's residence for a visit being extremely nice to her.

Later on during interviews, Lashonda Perkins, (Laqecia mother's significant other) reported Laqecia had told her that she told Deshon on Tuesday night she "Was still going to put him on child support."

After the two subjects were located, it was determined that foul play was involved and a search warrant for 1740 Corey Wood Circle was obtained. During the search, Laqecia's cell phone was located. After looking through the cell phone, the following text messages were sent/received on January 26, 2011.

Text messages
8:48PM – Sent from Deshon to Laqecia

LMAO, where are you at?

8:47PM - Sent from Laqecia's phone number (850) 566-2236 to Deshon

On my way home

8:49PM - Reply from Deshon's phone number (850) 459-0690 to Laqecia

Who gonna be there?

000117

*The text messages below have been grossly Fabricated by authorities. DeShon Thomas "Shon" never tells Laqecia that he is going to come over to her house. These text messages were not taken from the female victim's cell phone in correct content—these text messages are not from any cell phone carrier.

Item A: Cont. 3

AFFIDAVIT FOR SEARCH WARRANT



8:49PM – Reply from Laqecia's number to Deshon

Me, Nina and Sterling might be.

Misspelling of victim's daughter's name.

8:51PM – Reply from Deshon to Laqecia

What's his number?

8:58PM – Reply from Laqecia to Deshon

His phone broke.

8:58PM – Reply from Laqecia to Deshon

About 10:30

9:30PM – Reply from Deshon to Laqecia

I'm coming over there when I get off

9:31PM – Reply from Laqecia to Deshon

What time do you get off?

9:37PM – Reply from Deshon to Laqecia

1 Something

9:38PM – Reply from Laqecia to Deshon

Okay

9:43PM – Reply from Deshon to Laqecia

Let me know when Sterling get there.

9:43PM – Reply from Laqecia to Deshon

Okay

10:59PM – Message sent from Laqecia's phone to Deshon's

Sterling here.

*** END TEXT MESSAGES ***

000118

*Detectives had the victims' autopsy report. FDLE firearms section states that victims were murdered with a .38 caliber firearm--.38/ 357 projectiles not a 9mm round.

Item A: cont. 4

AFFIDAVIT FOR SEARCH WARRANT

Prior to the discovery of the deceased at approximately 10:19AM on January 27, 2011 their mother advised she attempted to call Laqecia's cellular phone several times. These calls were observed on Laqecia's phone as missed calls. The last known communication made by Laqecia was the 10:59PM text noted above.

After obtaining cellular site data for Deshon Thomas' phone records provided by AT&T, it was discovered that his cell phone was hitting off of the cellular tower in the area of State Road 20 and Capital Circle North West at approximately 0414 and 0415 hours on January 27, 2011. These times are associated to an outgoing and incoming text message.

Due to the discovery of the information provided by Laqecia's family members, her phone records and her involvement with Deshon Thomas, it is believed that he is responsible for the death of the two deceased individuals.

During the course of the investigation, a Confidential Informant advised that she/ he has seen Deshon Thomas in possession of a 9mm handgun and that the handgun is kept at Thomas' residence located at 1555 Delaney Drive, Apt 309. The Confidential Informant stated that he/ she has observed the weapon at this location (1555 Delaney Drive, Apt 309) numerous times. The Confidential Informant has seen this weapon at the residence within the last 10 days. The Confidential Informant knows this to be DeShon Thomas' weapon. The Confidential Informant is familiar with handguns and recognized the weapon as a 9mm semi-automatic pistol.

An autopsy of the victims confirmed that both victims died as a result of gunshot wounds consistent with a 9mm round. Additionally, the autopsy confirmed that Laqecia was approximately 21 weeks pregnant.

On the evening of 1/27/11, a traffic stop was conducted where contact was made with DeShon Thomas. At that time, he was observed to be wearing shoes that were consistent with a tread pattern found at the scene of the crime.

Also, there were no signs of forced entry to the residence, no obvious items removed, no signs of a struggle having occurred, and due to the positioning of the victims bodies this scene appeared consistent with the suspect having been known to the victim's. The front door to the residence was reportedly locked to include the door knob and deadbolt. The rear door was found open (possible exit point).

Your Affiant is a Detective with the Leon County Sheriff's Office, currently assigned to the Violent Crimes Unit. Your Affiant has been an officer of the Leon County Sheriff's Office for 18 years.

000119

Item A: cont.5 AFFIDAVIT FOR SEARCH WARRANT

On the basis of your affiant's experience and from the facts set forth herein, your Affiant believes and had good reason to believe that certain evidence, more particularly described herein of the crime of **Homicide**, is now being kept within said residence.

WHEREFORE, Affiant makes this affidavit and prays the issuance of a search warrant in due form of law for the search of the above described property for the hereinbefore described evidence to be seized and for the seizure and return thereof, subject to the order of the Honorable Court having competent jurisdiction, by the duly authorized officers of the Law.

Melinda McBride F26760

Melinda McBride, Affiant

Sworn to and subscribed before me this 28th day of January A.D. 2011.

Kenall W. Glenn
Judge in and for LEON County, Florida.

The above application for Search Warrant coming on to be heard and having examined the application under oath and the above sworn affidavit set forth and the facts alleged therein and thereupon being satisfied that there is probable cause to believe that the grounds set forth in said application and the facts alleged do exist and that the Law is being violated as alleged, I so find a Search Warrant is hereby allowed and issued.

This 28th day of January, A.D. 2011.

Kenall W. Glenn
JUDGE in and for LEON
County, Florida

000120

*Trentin Ross is the State's supposed key witness—as of May 2013, Trentin Ross has not gone to trial on these charges. Detectives may have conducted an illegal search of Trentin Ross' bedroom closet. DeShon Thomas slept on the couch in the living room—which is where all of his personal belongings were stored.

Item B: Cultivation of Marijuana found in Trentin's Closet.

IN THE CIRCUIT COURT OF THE
SECOND JUDICIAL CIRCUIT, IN
AND FOR LEON COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO. 11CF00375
SPN 216577

vs.

Deshon R. Thomas,

ANSWER TO DEMAND FOR DISCOVERY
AND
DEMAND FOR NOTICE OF ALIBI

Defendant(s).

Comes now the State of Florida, by and through the undersigned Assistant State Attorney, pursuant to defendant's DEMAND FOR DISCOVERY and Florida Rule of Criminal Procedure 3.220, and furnishes the following:

1. The names and addresses of all persons known to the prosecutor at the present time to have information which may be relevant to the offense charged and to any defense with respect thereto or to any similar fact evidence to be presented at trial under Section 90.404(2), Florida Statutes are listed below. All names listed below are Category A witnesses unless specifically designated otherwise.

Deputy Dave Farcas, Leon County Sheriff's Office
Trentin Ross, 1555 Delaney Dr, Tallahassee, FL
Mike Reeves, LCSO
Rob Swearingen, LCSO
Melinda McBride, LCSO
FDLE Analyst, Pending
C/I c/o Farcas

Witness List

2. Listed below are the statements of witnesses whose names were furnished in #1 above and copies of said statements or reports are Attached to defense counsel's copy of this Answer.

Farcas Reports, Ross as listed in reports

3. There are not written or recorded statements of the defendant and copies are not attached to defense counsel's copy of this Answer. The defendant did not make oral statements to the following persons, and the substance of those statements is listed below.

STATEMENTS MADE TO:

SUBSTANCE OF STATEMENT:

COM IN
COMPUTER
EC

4. There are not written or recorded statements of codefendants and copies are not attached to defense counsel's copy of this Answer. The co-defendant(s) did not make oral statements to the following persons, and the substance is listed below.

*According to the Probable Cause to support the arrest of DeShon Thomas, detectives state that they have a witness against DeShon Thomas and Trentin Ross—yet below shows no witness other than Leon County Sheriff's officials. Leon County Sheriff's deputies state that there is no confidential informant. LCSO lied in order to have DeShon Thomas charged with cultivation of marijuana—another area where Defense Attorney Greg Cummings failed to bring to light.

Item C: Cultivation of Marijuana *found in Trentin's closet.*

STATE OF FLORIDA

vs.

Trentin M. Ross,

Defendant(s).

IN THE CIRCUIT COURT OF THE
SECOND JUDICIAL CIRCUIT, IN
AND FOR LEON COUNTY, FLORIDA.

CASE NO. 11CF00310
SPN 216509

CLERK OF THE COURT
ANSWER TO DEMAND FOR DISCOVERY
AND
DEMAND FOR NOTICE OF ALIBI

Comes now the State of Florida, by and through the undersigned Assistant State Attorney, pursuant to defendant's DEMAND FOR DISCOVERY and Florida Rule of Criminal Procedure 3.220, and furnishes the following:

1. The names and addresses of all persons known to the prosecutor at the present time to have information which may be relevant to the offense charged and to any defense with respect thereto or to any similar fact evidence to be presented at trial under Section 90.404(2), Florida Statutes are listed below. All names listed below are Category A witnesses unless specifically designated otherwise.

{ Det. Dave Farcas, LCSO #354
Cpt. Rob Swearingen, LCSO #142

Witness List

2. Listed below are the statements of witnesses whose names were furnished in #1 above and copies of said statements or reports are Attached to defense counsel's copy of this Answer.

Det. Farcas

3. There are not written or recorded statements of the defendant and copies are not attached to defense counsel's copy of this Answer. The defendant did make oral statements to the following persons, and the substance of those statements is listed below.

STATEMENTS MADE TO:

SUBSTANCE OF STATEMENT:

See Report

4. There are not written or recorded statements of codefendants and copies are not attached to defense counsel's copy of this Answer. The co-defendant(s) did not make oral statements to the following persons, and the substance is listed below.

No Co-Defendants

IN
COMPUTER
EC

Item C : Cont.2

5. There is not recorded Grand Jury testimony of the defendant.
6. There are tangible items which were obtained from or belong to the defendant and are described below.
Photograph, fingerprints, glass pipe, dime bags, digital scale, 5 potted cannabis plants
7. Information relative to the offense was not provided by a confidential informant.
8. There was not electronic surveillance of the premises of the defendant or of conversation to which the defendant was not a party.
9. There was a search and seizure and documents related to any search and seizure are not attached.
10. There are reports or statements of experts, and copies of said reports or statements are not attached to defense counsel's copy and listed below.
FDLE Report (will be forwarded upon receipt)
11. The tangible evidence known to the prosecutor in addition to items mentioned in #6 preceding is listed below. **Any and all evidence seized**

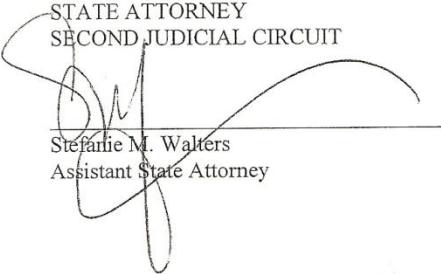
Defense counsel is hereby permitted, at a time and place mutually agreed upon by counsel for the State and for the defense, or as otherwise ordered by the Court, to inspect, copy, test and/or photograph the foregoing statements, documents, test results, and/or tangible items of evidence.

12. The State has herein submitted its complete ANSWER TO DEMAND FOR DISCOVERY pursuant to F.R.Cr.P. 3.220, and respectfully demands the defense to submit its corresponding witness list within seven days and disclose to the State and permit them to inspect, copy, test and/or photograph the information and material in the defendant's possession or control as listed in F.R.Cr.P. 3.220 within fifteen days after receipt of this ANSWER TO DEMAND FOR DISCOVERY.

13. The State hereby makes DEMAND FOR NOTICE OF ALIBI in the event such defense is to be used at the trial of this defendant.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Paul D. Srygley, 7043 Spencer Road, Tallahassee, FL 32312, on May 10, 2011 by U.S. Mail/hand delivery.

WILLIAM N. MEGGS
STATE ATTORNEY
SECOND JUDICIAL CIRCUIT


Stefanie M. Walters
Assistant State Attorney

*The 2nd lead detective, Don Odham, prepared this Summary of Offense and Probable Cause Affidavit, he was fired a few months after DeShon Thomas' arrest. State Prosecutor Jack Campbell approved the summary. Former Det. Don Odham is a Racist and a Liar.

Item D:1

LEON COUNTY SHERIFF'S OFFICE
SUMMARY OF OFFENSE AND PROBABLE CAUSE AFFIDAVIT

Arrest Affidavit

11 CJ98

LCSO CASE # 11-18445

DETECTIVE: D. Odham

VICTIM: L. Herring & S. Conner

TO: FIRST APPEARANCE MAGISTRATE

DEFENDANT: Deshon Thomas

CHARGES: 2 cts. 1st Degree Murder

DATE ARRESTED: _____

11 FEB - 7 PM 4:02

RECD
FBI
TALLAHASSEE
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

SUMMARY OF OFFENSE AND PROBABLE CAUSE AFFIDAVIT

THE ABOVE NAMED DEFENDANT WAS ARRESTED FOR THE FOLLOWING REASON

On Thursday, January 27, 2011, Laqecia Herring and her juvenile brother, Sterling Conner were found dead inside their home located at 1740 Corey Wood Circle in Tallahassee, Florida.

Through interviews with family members, it was determined that Deshon Thomas and Laqecia attended middle school together. Approximately seven months ago, Deshon and Laqecia began talking and started a relationship. Just a month into their relationship, Laqecia realized she was pregnant.

When Laqecia informed Deshon of her pregnancy, he offered to, and gave her approximately \$140.00 to go to a location at Cross Creek in Tallahassee so Laqecia could start the abortion process. It was reported Laqecia changed her mind and decided to not carry out the abortion. When the decision was made by Laqecia to not follow through with the abortion, Deshon decided not to have her as a friend on his face book site and stopped talking to her altogether.

According to family, Deshon and Laqecia began talking again approximately two weeks ago.

On Tuesday night, January 25, 2011, Deshon reportedly went to Laqecia's residence for a visit being extremely nice to her.

Later on during interviews, Lashonda Perkins, (Laqecia mother's significant other) reported Laqecia had told her that she told Deshon on Tuesday night she "Was still going to put him on child support."

After the two victims were located, it was determined that foul play was involved and a search warrant for 1740 Corey Wood Circle was obtained. During the search, Laqecia's cell phone was located. After looking through the cell phone, the following text messages were sent/received on January 26, 2011.

4:48PM - Sent from Deshon to Laqecia

"YO, where are you at?

4:47PM - Sent from Laqecia's phone number (850) 566-2236 to Deshon

IN
COMPUTER

my way home

000106

Item D: cont. 2

Page 2 of 5

11 CJ98

Victim:

#: 11-18446

3:49PM - Reply from Deshon's phone number (850) 459-0690 to Laqecia

Who gonna be there?

3:49PM - Reply from Laqecia's number to Deshon

Me, Nina and Sterling might be.

3:51PM - Reply from Deshon to Laqecia

What's his number?

3:58PM - Reply from Laqecia to Deshon

His phone broke.

3:58PM - Reply from Laqecia to Deshon

about 10:30

4:00PM - Reply from Deshon to Laqecia

I'm coming over there when I get off

4:31PM - Reply from Laqecia to Deshon

What time do you get off?

4:37PM - Reply from Deshon to Laqecia

Something

4:38PM - Reply from Laqecia to Deshon

kay

4:39PM - Reply from Deshon to Laqecia

Let me know when Sterling get there.

4:43PM - Reply from Laqecia to Deshon

ay

4:59PM - Message sent from Laqecia's phone to Deshon's

Sterling here.

000107

Item D: cont.3

Page 3 of 5

11C598

Victim:

#: 11-18445

*** END TEXT MESSAGES ***

Prior to the discovery of the deceased at approximately 10:19AM on January 27, 2011 their mother advised she attempted to call Laqecia's cellular phone several times. These calls were observed on Laqecia's phone as missed calls. The last known communication made by Laqecia was the 10:59PM text noted above.

After obtaining cellular site data for Deshon Thomas' phone records provided by AT&T, it was discovered that his cell phone was hitting off of the cellular tower in the area of State Road 20 and Capital Circle North West at approximately 0414 and 0415 hours on January 27, 2011. These times are associated to an outgoing and incoming text message.

Due to the discovery of the information provided by Laqecia's family members, her phone records and her involvement with Deshon Thomas, it is believed that he is responsible for the death of the two deceased individuals.

During the course of the investigation, a witness advised that she/ he has seen Deshon Thomas in possession of a handgun and that the handgun is kept at Thomas' residence located at 1555 Delaney Drive, Apt 309. The witness stated that he/ she has observed the weapon at this location (1555 Delaney Drive, Apt 309) numerous times. The witness has seen this weapon at the residence within the last 10 days. The witness knows this to be Deshon Thomas' weapon. The witness is familiar with handguns and recognized the weapon as a 9mm semi-automatic pistol.

An autopsy of the victims confirmed that both victims died as a result of gunshot wounds consistent with small caliber rounds. Additionally, the autopsy confirmed that Laqecia was approximately 21 weeks pregnant.

On the evening of 1/27/11, a traffic stop was conducted where contact was made with Deshon Thomas. At that time, he was observed to be wearing shoes that were consistent with a tread pattern found at the scene of the crime.

Also, there were no signs of forced entry to the residence, no obvious items removed, no signs of a struggle having occurred, and due to the positioning of the victims bodies this scene appeared consistent with the suspect having been known to the victim's. The front door to the residence was reportedly locked to include the door knob and leadbolt. The rear door was found open (possible exit point).

On Friday evening, 1/28/2011, at approximately 1900 hours Deshon Thomas along with his mother arrived at the CSO duty office requesting to speak with anyone investigating the death of Laqecia Herring and Sterling Conner. During a post Miranda interview Mr. Thomas stated he had known Ms. Herring and her brother, Mr. Conner, since middle school and renewed their friendship last year. He advised that he lived with Ms. Herring for a short period and during that time, "I think we conceived, I think I got her pregnant." He was confident of her pregnancy since he administered a pregnancy test with a positive result while he was living with her.

Mr. Thomas advised Ms. Herring and he had been discussing aborting the baby, but Ms. Herring changed her mind and decided to not have an abortion because they did not have the money for the abortion. Also, he said Ms. Herring advised due to medical conditions she did not want to have a late abortion. During this time they ended their relationship because of "all kind of things" and decided to keep the baby.

000108

*Here Det. Odham states that Trentin Ross voluntarily came to the sheriff's office... The 1st lead detective, Det. McBride's report contradicts Det. Odham. Furthermore, 2 days earlier, Lt. Baxter concluded his investigation with Trentin Ross, there were no findings to support probable cause to charge DeShon with the murders. Also, on 2/4/11, there was an Oral Motion in court relieving Trentin Ross of all Pre-trial cost to include UA's.

Item D: cont. 4

Page 4 of 5

Victim:

#: 11-18445

11 CJ98

Mr. Thomas advised that there was no problem with Ms. Herring having the baby since his mother was going to assist him with the finances for raising the baby including child support. He said this baby would be his first child.

Mr. Thomas advised he had not seen Ms. Herring since last year but she continued to text and communicate with him on Facebook.

He advised that on Wednesday morning, 01/26/2011 he woke up late after working at Taco Bell the night before so he did not go to school and stayed at home all day until he went to work later that evening. While at work Ms. Herring texted him several messages requesting they get together when he got off work. Mr. Thomas assumed she wanted to discuss about getting back together. Mr. Thomas texted Ms. Herring he "may or may not" go by her residence to see her because he works late and needed to catch the city bus to school the next day at 7 a.m. Upon leaving work, Mr. Thomas advised he went to his residence, went to sleep and did not go to Ms. Herring's residence.

Mr. Thomas' statement that he returned to his residence on Delaney Dr. immediately after work is not consistent with Mr. Thomas's cell phone cell site tower records.

Thursday, 01/27/2011 Mr. Thomas stated he did not go to school and woke up late in the afternoon. He advised his girlfriend, Brittney Little, texted him, about 5 or 5:30p.m., asking where Ms. Herring lives. He responded she lived at Wolf Creek off of Highway 20. She responded to him by text message advising him to watch the news. He said he watched the 5:30 news and was at a loss for words and shocked about seeing the news about his friends.

On Friday 04 February 2011, Trentin Ross (Deshon Thomas' roommate) voluntarily responded to this agency for an interview.

On 27 January 2011, Trentin and Deshon went out. Trentin advised that prior to leaving their apartment complex on Delaney Dr. He observed Deshon place a black bag containing what he believed to be the three guns that Deshon owned. He described the guns as a Tech-9 9mm, another 9mm and a revolver into the trunk of the vehicle they were driving.

Trentin advised that on 27 January 2011 shortly after 0200 hours, they went to a friend's (B.J.) house and then to a male's house on November Ct. After leaving the female's house they drove around the area of the victim's residence. They eventually parked across the street (Hwy 20) from the victim's residence. Deshon had him pull the lever to open the trunk of the vehicle. Deshon retrieved something, Trentin believed to be a gun from the trunk. Trentin stayed in the vehicle while Deshon walked away in the direction of the victim's residence. Deshon was wearing a black "hoodie" and had his hand inside the hoodie as he walked away. Trentin observed lights coming on and off inside the victim's residence. Sometime later Deshon sent him a text requesting Trentin to let him know when the highway was clear. Trentin sent Deshon a text telling him the highway was clear. Trentin heard two shots and then a large truck drove by. Trentin observed Deshon coming towards the vehicle. He did not see Deshon come out of the back door, but the door was open and it had not been open earlier. Deshon came to the vehicle, at which time Trentin observed that Deshon was shaking, sweaty and "looked like he had seen a ghost". Deshon told him "it ain't like it is in the movies". Deshon had Trentin drive to the parking lot of the Family Dollar. Deshon told him, "now is not the time to make mistakes". Deshon instructed Trentin to back up to the dumpsters. Deshon exited the vehicle, at which time it appeared that Deshon put something into the dumpster.

000100

*Detectives do not know who they want to have been the target of the murders. First, it was Laqecia because DeShon didn't want the baby. Then it was her brother, Sterling because Sterling was in a rival gang. When the truth of the matter is DeShon Did Not murder either of them. None of the victims' family members state that DeShon is the murderer—nor the possible murderer.

There are

too many lies to outline them all. Greg Cummings did nothing to straighten the lies out.

Item D: cont. 5

Page 5 of 5

11 CT98

Victim:

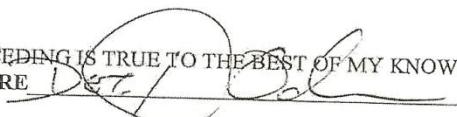
e #: 11-18445

They drove to several other locations before returning to their residence. Later that morning Trentin overheard Deshon talking to someone outside the apartment. He heard Deshon say "two to the head, she was slumped over in the chair and little crab lying on the floor with a blanket over his head".

Trentin advised that the same evening Deshon dropped off the Tech-9 9mm off at a female's apartment on Blountstown Street. Using the information that Trentin provided, the Tech-9 9mm was recovered Saturday 05 February 2011 by this agency.

It should be noted that Laqecia was found sitting in a chair slumped to one side. Sterling was found lying on the floor completely covered from head to toe with blankets. Both victims suffered from gun shot wounds to the head.

Approved
J. L. G. ASTA

THE PRECEDING IS TRUE TO THE BEST OF MY KNOWLEDGE OR BELIEF.
SIGNATURE 

AGENCY: LEON COUNTY SHERIFF'S OFFICE

NOTARIZATION:

SWORN AND SUBSCRIBED BEFORE ME THIS 7 DAY
OF FEB 2011.

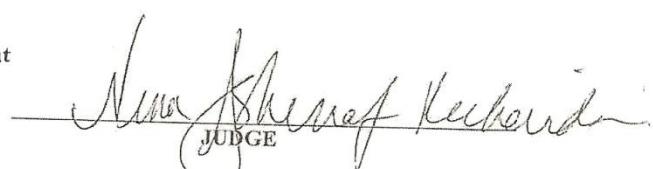

NOTARY PUBLIC / ASSISTANT STATE ATTORNEY / L.E.O.

NOTARY COMMISSION EXPIRES: FULL TIME L.E.O.

ORDER

THIS CAUSE coming before me as a First Appearance Magistrate, and having reviewed the preceding affidavit, this court finds:

Probable Cause Is Sufficient
 Probable Cause Is NOT Sufficient


JUDGE

000110

Item D: Cont. 6

In the County Court
Leon County, Florida

COMPLAINT

STATE OF FLORIDA
vs.

Deshon R. Thomas

Defendant

3650 Lana Circle
Tall, Fl. 32310

Address

IN THE NAME AND BY THE AUTHORITY OF THE
STATE OF FLORIDA

Before me, the undersigned authority, personally appeared D.Odham who being first duly sworn

says that on the 27 day of January, A.D. 2011, in Leon County, Florida, the aforesaid defendant

lawfully kill a human being, Sterling Conner, by shooting him in the head, and the killing was perpetrated from with a premeditated design or intent to effect the death of Sterling Conner, contrary to Section 782.04(1)(a)1, Florida Statutes.

contrary to the statute, rule regulation or other provision of law in such case made and provided, and against the peace and
integrity of the State of Florida.

D. Odham
Complainant

25 Municipal Way Tallahassee, FL 32304

dress

Sworn to and subscribed before me this 7 day of FEBRUARY, 2011.

Judge Dennis LCSO
Judge, Assistant State Attorney or Notary Public

SEAL

IN
COMPUTER

000111

Warrant # 11CJ98
Agency Case # 11-18445
Officer I.D. # D. Odham 1206
Charge Murder-First Degree (CAP.)
Degree of Charge Capital
Statute No. 782.04(1)(a)1
DOB 7/11/93 Sex M
Race B Hgt 508
Wgt 200 Hair Blk
Eyes Bro SSN 595-33-6091
Ref. # 2535 SPN 216577
DL#/ST T520-176-93-251-0

11 FEB
CLERK
COURT
LEON
FLORIDA
B
D
PH 4:02

*This is from Det. McBride's report—which completely contradicts former Det. Odham's accounts regarding Trentin Ross on 2/4/11.

LEON COUNTY SHERIFF'S OFFICE
SUPPLEMENTAL / CONTINUATION

Jimmy Williams, B/M, 02-26-93 (juvenile)
98 Peachtree Street
Tallahassee, FL 32303
(850) 422-0789 hm #
(850) 491-4754 cell # Jimmy

Item E:
Detective
Melinda
McBride

Contact was made with Dep. Jon Etheridge (School Resource Deputy at Godby). He knew Jimmy and Benny Williams and agreed to contact them and transport them to LCSO. Upon arrival, I was informed that Jimmy and Benny elected to notify their parents when they arrived to LCSO. I requested that Jimmy make efforts to contact their parents. He advised he sent a text message and attempted to call his mother. Due to not being able to reach her he called his father, who was fine with them talking to us. I conducted the recorded interview with Jimmy (Item# 10MM) and Det. Dave Farcas assisted by conducting the recorded interview with Benny Williams. Jimmy advised in essence the following:

He heard about this incident the day after it occurred. He said that he caught the City Bus #4 on Friday (01-28-11) from the bus terminal to go to his girlfriend's house off Centerville Road. He was on the bus already when DeShon got on. Jimmy said this was the first time he'd seen DeShon in at least a month or month and a half when they hung out at the mall. He said he originally met DeShon through his friend Tyrell Jones "TJ".

Jimmy said that DeShon asked him if he heard about what happened to Sterling and Laqecia. He said DeShon said to him that he doesn't know why someone would do that. He said DeShon told him that he didn't go to work because of this.

Jimmy went on to say that on the other day he caught the City Bus from home to go to Palmer Monroe Recreation Center. He said there was a black male and some black females there he heard talking about there being a male subject at Leon bragging about having killed Laqecia because she was a witness and he made the baby watch. Jimmy said he didn't know any of the subjects and he never heard them say who this male subject was.

***** End of interview with Jimmy Williams on 02-02-11 *****

Thursday 02-03-11

Due to information gathered from Ronterrious Conner during the interview with Det. Reeves on 02-01-11, I meet with him to show a picture of whom we suspected to be "Q", the subject he advised gave Sterling fake money to buy drugs. Ronterrious had shown Det. Reeves where "Q", identified as Jimquan J. Gordon (B/M, 12-19-89) lived. Ronterrious identified Mr. Gordon as the subject he advised gave Sterling fake money to buy drugs. Also, see Det. Reeves' report. The photographs shown were placed into evidence (item #21MM).

Friday 02-04-11

Sgt. Ganey contacted and scheduled an interview with Riley Ewell and Trentin Ross. Those interviews were conducted by Sgt. Ganey and Det. Odham. Also, Det. Dawn Dennis conducted a CVSA with Riley, with results of "no deception" indicated. See their reports for details.

Above contradicts Det. Odham's claim of Trentin Ross' voluntary respond...

Page 10 of 12

000066

*According to Greg Cummings—for more than a year, Trentin Ross never seemed to be available to give a sworn deposition. The email below shows where State Prosecutor Jack Campbell planned to travel to convince Trentin Ross—their supposed key witness. Trentin Ross has an attorney by the name of Paul Srygley.

Hotmail Print Message

Item F:

Page 1 of 1

Re: FYI

From: **Gregory J. Cummings** (gregcummings@fairpoint.net)
Sent: Wed 7/18/12 6:01 PM
To: CARISSA CHAMBERS (ccari27@hotmail.com)
1 attachment
vCard.vcf (0.4 KB),

TR depo was to be taken today. I called his attorney last week to inquire if all was set. He got back to me Monday night and left only a message to call him and I talked to him before court. However, on Tuesday I was told by his attorney he could not make it because of his work schedule and we would have to go there to depose him. His attorney does not want to make the trip because it would take an entire day and because I believe he will not get paid for it.

So, the depo was reset for 8-10 here in Tallahassee with Jack Campbell going to talk to his parents and trying to convince them to him come up here that was what I knew before court yesterday. Now that the case is set for October I'm not sure what will happen on the 10th.

I will keep you posted. Really. I will make a concerted effort to keep lines of communication open with the both of you. I told Deshon I would see him every two weeks give or take a few days. And I will.

Yes TR will get a better deal than he would have normally if he "testifies consistently" with his past statements. That is the term routinely used in this line of work. At trial the state will make a big deal of "No deals have been made" no threats or promises but the jury will get the idea of what is hanging over his head and the continuances of his case...

On Apr 26, 2012, at 3:53 PM, CARISSA CHAMBERS wrote:

> Yesterday Trentin Ross was due in court for cultivating marijuana and possession of drug paraphernalia. However, his case was rescheduled for the last week of August.
>
> I'm not surprised by this because each time DeShon's case has been rescheduled Trentin Ross' case gets rescheduled--always dated afterwards . I believe Trentin Ross' 1st court date was set for sometime in Jan or Feb before it was rescheduled for April 25th which would've been after DeShon's trial had he gone to trial on April 9th as originally scheduled. Seems to me like a deal may be in the making for Trentin Ross' testimony in DeShon's case.
>
> Any idea of when you'll be taking Trentin Ross' deposition?
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> Thanks
> Sent via BlackBerry from T-Mobile
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