

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

STATE OF FLORIDA

CASE NO. 11-18445  
SPN

vs.

**SEALED**

Homicide Investigation

**MOTION FOR AN ORDER REQUESTING TELEPHONE RECORDS AND  
GEO-PRECISION LOCATION INFORMATION**

Comes now affiant Investigator Detective Dawn Dennis who is a sworn Law Enforcement Officer with the Leon County Sheriff's Office and applies to this Court for an order Authorizing the Disclosure of Telephone Records and Geo-Precision Location information on the following grounds:

The Leon County Sheriff's Office has an ongoing criminal investigation Case # 11-18445 involving cellular telephone number (850) 459-0690. It is hereby certified that the information likely to be obtained is relevant to the ongoing criminal investigation being conducted by the Leon County Sheriff's Office involving DEFENDANT for the offense of Homicide.

It is certified that there is a clear connection between illegal activity and the person whose privacy would be invaded. It is further certified, as set forth in the affidavit attached hereto and incorporated herein as Exhibit A, that there is a reasonable founded suspicion that the targeted cellular telephone facility is being used for a criminal purpose, and that alternative means of investigation have been considered or attempted and that no less intrusive means will be effective in attaining the objectives of this ongoing criminal investigation. This application is made pursuant to Florida Statutes 934.23(4) and/or (5), 934.32, and Shaktman v. State, 553 So. 2d 148 (Fla. 1989).

It is further requested that this Court order AT&T (PO Box 24679 W. Palm Beach, FL 33416) and other providers of wire and/or electronic communications services, landlords, custodians, and other persons and entities to:

(1) Provide all subscriber information, including name and address, date account created, account status, e-mail address, alternate e-mail address, serial number(s) of handset(s) (i.e. IMEI, ESN, and/or MEID), subscriber identity number(s) (i.e. IMSI, MIN, and/or MSID), billing and payment history including method of payment, and account comments created during any contact between the subscriber and a sales, billing or service representative.

(2) Provide call detail records with cell site data; including all inbound and outbound communication events (voice, text, internet or packet data) **without content**, dates, times and duration of communication events, originating and terminating cell sites with sector designations, and a listing of applicable cell site locations, sectors, and orientations for January 26th, 2011 to present.

(3) Provide, upon written request, the names, addresses, billing and credit information of the subscribers of record, whether published or non-published, for the telephone numbers directly identified through this court order

(4) Provide Geo-Precision (GPS, Locator Tools, Latitude/Longitude) Locations and/or E911 or other such precision location assistance if available; signaling and communications processing information, without communications content, sent and received by the target cellular telephone for any form of communication it is capable of, to include: voice, text, internet, and packet data; control channels used for a period not to exceed sixty (60) days from the data of this Order.

By: Dawn Dennis

Affiant  
Detective Dawn Dennis  
Leon County Sheriff's Office

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AFFIDAVIT

I, Detective Dawn Dennis, being duly sworn, do hereby depose and say:

I am conducting or participating in a criminal investigation of two Homicides

In summary, the facts are as follows:

On 27 January 2011, this agency received a call for service at 1740 Corey wood Circle. Upon arrival the bodies of 20 year old Laqecia Herring and her 17 year old brother S.C. were discovered inside the residence. Further investigation revealed that the deceased were victims of homicide. Interviews with the victim's family members revealed that Laqecia was approximately 5 months pregnant. The father of the unborn child was reported to be 17 year old Deshon Thomas. Mr. Thomas was reportedly not happy about the pregnancy and requested that Laqecia abort the child. Laqecia declined to abort the child, at which time Mr. Thomas ceased contact with her for approximately 5 months. Mr. Thomas also reportedly blocked Laqecia from access to his Facebook page until recently. Laqecia advised friends and family that Mr. Thomas came to her residence on the evening of Tuesday 25 January 2011, to speak to her about the pregnancy. Laqecia advised Mr. Thomas that she intended to file for child support.

During the search of the residence, Detectives located Laqecia's cell phone. While searching through Laqecia's cell phone, Detectives observed communication between Laqecia and another subject that is listed in Laqecia's phone contacts as "Shon", 850-459-0690. The two text messaged each other numerous times on Wednesday 26 January 2011. These messages to each other indicated that "Shon" wanted to know who would be at Laqecia's house, what time S.C. would be home and that he would come over to Laqecia's house when he got off work. "Shon" is believed to be Deshon Rashard Thomas.

STATE OF FLORIDA, COUNTY OF LEON:

Sworn to and subscribed before me this 26th day of January 2011, by

Det. Dawn Dennis

Ronald W. [Signature]  
Notary Public, State of Florida

Personally Known: \_\_\_\_\_

Produced Identification: \_\_\_\_\_

Type: \_\_\_\_\_