# IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR CHARLOTTE, FLORIDA CRIMINAL ACTION

## WARRANT TO ARREST

STATE OF FLORIDA

VS.

MATTHEW C. ROSS

Race: White Sex: Male Weight: Height: 5-11 Eyes: Brown

Hair: Brown

Address:

IN THE NAME OF THE STATE OF FLORIDA:

TO ALL AND SINGULAR SHERIFFS AND OTHER ARRESTING OFFICERS OF THE STATE OF FLORIDA.

WHEREAS, John Tadlock, Florida Department of Corrections, Office of the Inspector General, has this day made oath before me, in Charlotte County, Florida, that Matthew C. Ross,

- 1. Between June 01, 2020 and September 30, 2020 in Charlotte County, Florida, did unlawfully introduce, take, attempt to take, or send upon the grounds of a State Correctional Institution, to-wit: Charlotte County Corrections Institute, contraband, to-wit: food and cigarettes, contrary to Florida Statute 944.47(1)(a),
- 2. On or about June 23, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),
- 3. On or about July 06, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),

- 4. On or about July 15, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1).
- 5. On or about July 20, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),
- 6. On or about July 25, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),
- 7. On or about August 04, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),
- 8. On or about September 18, 2020 in Charlotte County, Florida, did unlawfully, while a public servant, corruptly request, solicit, accept, or agree to accept, any pecuniary or other benefit not authorized by law, for the past present, or future performance, nonperformance, or violation of any act or omission which he believed to have been, or as a public servant represented as having been, either within the official discretion of the public servant, in violation of a public duty or in performance of a public duty, contrary to Florida Statute 838.016(1),

contrary to the statute in such cases made and provided, and against the peace and dignity of the STATE OF FLORIDA.

AND it appears to the Court that probable cause for the issuance of this warrant has been shown and the Court being satisfied of the existence of the grounds thereof.

CLR:rcl

NOW, THEREFORE, you are commanded forthwith to arrest the said Matthew C. Ross and bring him before me or another County or Circuit Judge with jurisdiction to be dealt with according to law.

|   | Bond to be set by First Appearance Judge               |
|---|--|
| h | Bond set at \$ CT 1 - \$ 6,250 . CT2-5 R.OR CT 6-6,250 |
| O | No Bond CT.7-6,250; CT.8-\$6,250                       |
|   | Release on Own Recognizance                            |
|   |  |

Given under my hand and seal this 215 day of October, 21

Judge, Charlotte County

CHARLOTTE COUNTY, STATE OF FLORIDA STATE OF FLORIDA VS. MATTHEW C. ROSS

### CHARGE(S):

- 1) Conspire Introduction/Contraband Into Corr. Facility, F.S. 944.47(1)(a), 777.04(3) Second Degree Felony
- 2) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 3) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 4) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 5) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 6) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 7) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony
- 8) Unlawful Compensation or Reward for Official Behavior, F.S. 838.016(1), Second Degree Felony

CLR:rcl

|                | Returnable the FILED THIS                       | day of<br>DAY OF |       | , A.D.,   |  |
|----------------|---|------------------|-------|---|--|
| day of, ar     | Warrant of, A.D., ne within-named and he court, | aving him        | FEES: | : Arrest\$ Return Committing to Jail Mileage Release Approving Bond TOTAL: \$ |  |
| Arresting Offi | cer   |                  |       |   |  |
| Florida Depart | tment of Corrections<br>ncy CR#: 22-02560       |                  |       | SAO Warrant #: 2748454  |  |

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR CHARLOTTE COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.

-VS-

AGENCY CASE NO. 22-02560

Matthew Christopher Ross

Defendant(s)

RACE/SEX: White /Male

DOB: SSN:

35N:

ADDRESS:

AFFIDAVIT FOR ARREST

Before me, Circuit Court Judge Stat H. Appeared an affidavit from Inspector John Tadlock, who being sworn, deposes and says:

COUNT 1: Conspiracy to Introduce Contraband into a State Institution

That Matthew Christopher Ross, a Correctional Officer at Charlotte Correctional Institution, between June 2020, and September 2020, did then and there knowingly, except through regular channels as authorized by the officer in charge of the correctional institution, provide any article of food or clothing given or transmitted, or intended to be given or transmitted, to any inmate of any state correctional institution for the purpose of providing an inmate contraband, while employed and on duty at Charlotte Correctional Institution, contrary to Florida State Statute 777.04(3)/944.47(1)(a)(2).

#### COUNT 2-8: Unlawful Compensation

That Matthew Christopher Ross, a Correctional Officer at Charlotte Correctional Institution, on June 23, 2020, July 6, 2020, July 15, 2020, July 20, 2020, July 25, 2020, August 4, 2020, and September 18, 2020, did then and there knowingly accept monetary compensation (on 7 separate occasions), via VENMO money transfer, from an inmate for the purpose of providing an inmate contraband and other unauthorized items, while employed and on duty at Charlotte Correctional Institution, contrary to Florida Statute 838.016

Your Affiant has documented his probable cause in a Complaint Affidavit attached to this document as EXHIBIT A; wherein, the above violations are further explained. Your Affiant swears that EXHIBIT A is true.

WHEREFORE, your Affiant prays that an arrest warrant be issued according to law, commanding all and singular, the Sheriffs of the State of Florida, to forthwith, arrest said Matthew Christopher Ross, and bring him before the court to answer the charge of: Conspiracy to Introduce Contraband into a state correctional institution and Unlawful Compensation.

Sworn to and subscribed before me, the undersigned authority this

21 day of October 2022

Ryn Gulful Muse Ryan Cranted Muse John Tadlock ID#
AFFIANT

JUDGE

ID#

SWORN TO AND SUBSCRIBED BEACRE ME THIS \_\_ ON THE PACE OF

OF THE ABOVE/COURT

REVIEWED

#### PROBABLE CAUSE AFFIDAVIT

|   |  |            |          |          | INO   | DADLI  | CAUSE   |  |                            |  | ,   |                 |                                 |  |  |
|---|--|------------|----------|----------|---|--|---|--|----------------------------|--|---|-----------------|---------------------------------|--|--|
| OBTS#   |  |            |          |          | 1. Arrest Affidavit 3. Complaint Affidavit 2. Notice to Appear 4. Request for Capias 5. Teen Court Referral |  |   |  |                            | 4  |   | Juvenile        |                                 |  |  |
| ORI#  | FL0037275C Office of Ins   |            |          |          |   | of Ins   | spector General - DC Repor                                      |  |                            |  | rt#   | # 22-02560      |                                 |  |  |
| Location of Off   | ense: Charlo   | tte Correc | tional I | -        |   |  |   |  |                            | f Offense:                               |   | 20              | Date of Arrest                  |  |  |
| Name: Matthe  | w Christophe   | r Ross     |          |          |   |  |   |  |                            |  |   |                 |                                 |  |  |
|   | Indian American Oriental Asian  Race Sex W M                             |            |          | DOB      | or Age  | Height<br>5'11"  | Weight<br>N/A   | Eye Color<br>BRN                           | olor Hair Color<br>BRN     |  | Comple:<br>MED                                  | xion            | Build<br>MED                    |  |  |
| Address (Street, Apt, Number (City) (State)   |  |            |          |          |   |  |   |  |                            | Phone                                    |   |                 |                                 |  |  |
| □ 1. Parent Name of Parent or Custodian (Last, First, Middle) □ 2. Legal Custodian □ 3. Other Residence Phone |  |            |          |          |   |  |   |  |                            |  | Residence Phone                                 |                 |                                 |  |  |
| Address (Street, Apt, Number) (City) (State) Busin  |  |            |          |          |   |  |   |  | Business Phone             |  |   |                 |                                 |  |  |
| Notified By: (Name) Date  |  |            |          |          |   | te Time Juvenile Disposition 1. Handled / Processed within Dept and Released |   |  | essed                      |  | rned over to DOH/C&F<br>carcerated (County Jail |                 |                                 |  |  |
| Released to: (N   | ame)   |            |          |          |   |  |   | Relationshi                                | р                          |  | Date  |                 | Time                            |  |  |
| N, N/A B. Buy D. Deliver Distribute Produce / N. N/A C. Cocain  |  |            |          |          |   |  |   | B. Barbiturate<br>C. Cocaine<br>E. Heroine | M. M                       | allucinogen<br>Iarijuana<br>pium / Deriv | P. Paraph<br>Equip<br>S. Synthe                 | ment            | U. Unknown<br>Z. Other          |  |  |
| Charge Description Counts S.S. Introduction of Contraband (Conspiracy) 1 0 ord                                |  |            |          |          |   | ⊠ F.S.   | State Violation Number: 777.04(3)/944.47(1)(a)(2)               |  |                            |  | Violation of Section (ORD)                      |                 |                                 |  |  |
| Activity<br>S   |  | Type<br>Z  | Amou     | int / Un | it  |  | State Attorney  | Number                                     | Co                         | urt Numbe                                | er  |                 |                                 |  |  |
| □ PC      Cap<br>#  | ☐ Capias ☐ AC ☐ BW ☐ PW ☐ Juv. PU ☐ Citation ☐ Date Issued ☐ Writt. Att. |            |          |          |   |  |   | Att.                                       |                            |  | ☐ Dome  | estic Viol Inj. |                                 |  |  |
| Charge Description Counts ☐ F.S. Unlawful Compensation 7 ☐ Ord  |  |            |          |          | State Violatio<br>838.016   |  |   |  | Violation of Section (ORD) |  |   |                 |                                 |  |  |
| Activity<br>S   | 3  |            |          |          |   |  | State Attorney Number Court Number                              |  |                            |  |   |                 |                                 |  |  |
| ☑ PC ☐ Cap<br>#   | ias 🗖 AC   | □BW        | □ PW     | □ Ju     | , PU 🗆  | ] Citation   | n Date Issued Writt. Att. □ Domestic Viol Inj. □ Order of Arres |  |                            |  |   |                 | estic Viol Inj. Order of Arrest |  |  |
| The Undersigned C<br>On the 19th day of   |  |            |          |          |   |  |   | e that the above                           | -named (                   | Defendant co                             | mmitted th                                      | e followii      | ng Violation of the law:        |  |  |

Your Affiant is Inspector John Tadlock with the Office of Inspector General for the Florida Department of Corrections. The Defendant is Correctional Officer Sergeant Matthew Christopher Ross (Sergeant Ross), who is currently employed by the FDC at Charlotte Correctional Institution (CCI). Your Affiant has investigated a Conspiracy to Introduce of Contraband and Unlawful Compensation case alleging Sergeant Ross conspired to receive financial gain from Inmate Nathan Carswell (Inmate Carswell) DC# 966750 for the introduction of food and cigarettes into the secure perimeter of CCI.

Inmate Carswell testified that Sergeant Ross conspired with Inmate Carswell to introduce food and cigarettes into the secure perimeter of CCI, and in return Sergeant Ross was being compensated via money transfers through VENMO, a mobile payment service. Inmate Carswell would transfer the monies from his VENMO account (B-Boy/Buck239Town@gmail.com) to Sergeant Ross' VENMO account (Mross220/m.ross220@gmail.com) and would receive the contraband items from Sergeant Ross after the payment was made.

Subpoenaed VENMO records revealed Inmate Carswell transferred money to Sergeant Ross for the aforementioned items. There were seven (7) transactions made for a total of \$835.00 transferred to Sergeant Ross' VENMO account from Inmate Carswell's VENMO account. The first transaction was made on June 23, 2020, for \$100 with a notation for food, the second was made on July 6, 2020, for \$100 with a notation for food, the third was made on July 15, 2020, for \$100 with a notation for food, the fifth was made on July 25, 2020, for \$125 with a notation for hygiene products, the sixth was made on August 4, 2020, for \$150 with a notation for food, and the seventh was made on September 18, 2020, for \$100 with a notation for fantasy football.

These transactions were sent to Sergeant Ross while Inmate Carswell was housed at CCI which is where Sergeant Ross was and still assigned at the time. The VENMO transactions had notes indicating the money was being sent for food (5x), hygiene products(1x), and fantasy football (1x).

Your Affiant respectfully submits probable cause has been established indicating Correctional Officer Sergeant Matthew Christopher Ross did commit one (1) count of Conspiracy to Introduce of Contraband in violation of Florida State Statute 777.04(3)/944.47(1)(a)(2) and seven (7) counts of Unlawful Compensation in violation of Florida State Statute 838.016 in Charlotte County, Charlotte Correctional Institution, from June 23, 2020, through September 18, 2020. Your Affiant respectfully requests a warrant be issued for Matthew Christopher Ross for one (1) count of Florida State Statute 777.04(3)/944.47(1)(a)(2), Conspiracy to Introduce of Contraband and seven (7) counts of Florida State Statute 838.016, Unlawful Compensation.

All supporting documents will be available for review and will be further explained in your Affiant's report of investigation.

|  | PC. Exists for Charge(s)  | Judge's Signa              | nture               |      |               | Date                  |      |                   |  |
|--|---|----------------------------|---------------------|------|---------------|-----------------------|------|-------------------|--|
| Miranda Hold for Agency Warning Name                                 | Verified By:  | Date:                      |                     |      | Bond Charge # | Bond Charge #         | Bond | Charge #          |  |
| Adults Only Hold for First Appearance Do not Bond Out Reason;        | Bond Type 1. ROR 2. Cash  | Surety     Bail /     Bond | 5. Cert<br>6. Other | Туре | Туре          | Туре                  |      |                   |  |
| I swear/Afirm the above and attached statements are true and correct | Swom to and subscribed before me,<br>the undersigned authority this<br>19 day of October 2022 | Returnable Co              | ourt Date           |      |               | Returnable Court Time |      |                   |  |
| Inspector's / Complainant's Signature                                | Name/Title of Person Authorized to Administer Oath  IN SPLCTON SUPERVISOR  JARO BEWEY         | Release Date               |                     |      |               | Release Time          |      | □ AM<br>□ PM      |  |
| Name (Printed) John Tadlock [D# 114721                               |   | Releasing Officer          |                     |      |               |                       |      | Page<br>2_ of _2_ |  |