STATE OF FLORIDA IN THE CIRCUIT COURT OF THE 8TH JUDICIAL CIRCUIT IN AND FOR GILCHRIST COUNTY FLORIDA

State of Florida, -VS-SHANNON JILL ALLEN Defendant.

UCN: 212024CF000017CFAXMX Case Number: 24000017CFAXMX Agency Case Number: 23-21586

CAPIAS

RACE: White SEX	: Female DO	B:	E.
HT: 5' 6" WT: 250	EYES: BLUI	E HAIR: BRO	OWN D/L: FL
SS	IN:		

To Each Sheriff of the State:

This is to command you to take SHANNON JILL ALLEN if she be found in your County and her safely keep, so that you have her body before one of the Judges of our Circuit Court, at GILCHRIST, Florida, TRENTON, INSTANTER to answer the charges found and now pending in said Circuit Court for STATE FILED INFO to the charge(s) of:

Release Amount **Chapter Section** Degree Statute Release Level \$ 50,000.00 944 35 3b Felony Third SEX OFFENSE DOC BOND Degree EMPL SEX MISCONDUCT W INMATE OR OFFENDER

on 02/01/2024 and have then and there this writ with due return of your action endorsed thereon.

CONDITION OF RELEASE:

EXTRADITION AUTHORIZED FOR SOUTHEAST REGION, NO CONTACT WITH THE VICTIM(S). THE CIRCULATION

Ordered by HONORABLE DAVID P KREIDER. Judge

WITNESS my hand and the seal of said Court on 1st of February, 2024.

TODD NEWTO CLERK OF COL BY: IADOUR



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Clerk	The Contract of the Contract o	HRI	ST	OUT	S. Harris	ŧ.
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of GIL				da		

		RETURN OF SER	VICE
	nis Warrant on the _		
one SHAN	NON JILL ALLEN 1	he within named Defendant	t, in the Circuit, Court of GILCHRIST, Florid
on the	day of	, , , , , , , , , , , , , , , , , , ,	∴
		Sheriff, GI	ILCHRIST, Florida
		By:	
		De	eputy Sheriff

DETTION OF SEDVICE

_ A	RREST SWORN COMPLAINT HOL	.D	24	, -	1				JUVENILE	□ N	OTICE TO APPEAR
овтѕ	NUMBER:	OFFICE		E INS		R GEN	ERAL	SPN NUMBE	R:		
	CY ORI NUMBER: 037275C	PRO	OBABLI	E CAU	SE AFF	IDAVI	т	23-215	SE REPORT NU	IMBER:	
	NAME OF SUBJECT (LAST, FIRST, MI): Allen, Shannon Jill				ALIAS/	MAIDEN:		<u></u>			
	911 HOME ADDRESS (STREET, APARTMENT NUMBER, ETG	5.):	CITY:				STATE:	ZIP CODE:	-		TELEPHONE NUMBER:
	BUSINESS / SCHOOL ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.) 3449 S.W. STATE ROAD 26		CITY:	CITY:			STATE:			TELEPHONE NUMBER: (352) 463-4919	
F	MAILING ADDRESS (PO BOX, ETC. IF DIFFERENT THAN 91	1 ADDRESS):	1				, ,				
DEFENDANT	RACE: SEX: SEX: SEX: F	DATE OF BIRTH:	HEIGHT: 5'06"	weight:	HAIF	COLOR:	EYE COLO	R: COMPLI			BUILD: Heavy
DEFE	BLACK ASIAN / ORIENTAL DRIVERS LICENSE / STATE ID NUMBER: STATE (RITY NUMBER:		NUMBER:		CE OF BIRTH:	C	DUNTRY OF CIT	IZENSHIP:	Tieavy
	SUBJECT'S OCCUPATION:	SPN NUMBER:	:		GENCY ORI NUM			ENCY ID / NUMB		BOOKING	NUMBER:
	Academic Teacher LOCATION OF ARREST:				FL0372	TIME O	FARREST	DATE OF	BOOKING:		TIME OF BOOKING
	N/A - SWORN COMPLAINT SUBJECT IDENTIFIED BY WHOM (MCTIM, WITNESS, LEO,	ETC.):		<u> </u>	SUBJEC	(MILITA	RY): RIFIED BY (PHOT	O ID, FAMILY ME	MBER, KNOWN	TO OFFICE	(MILITARY): R, ETC.):
	Law Enforcement (NAME):	DATE OF BIRT	H: RAC	E: SEX	DAV	RT NUMBER:		ARRESTED SWORN	FELO	NY	JUVENILE:
S P							CO	MPLAINT NTA	MISDEME	FIC CASE	□ NO
NILE	JUVENILE DISPOSITION: RELEASED TO JAC ISSUED NTA AND RELEASED	RENT/GUARDIAN (NO	TIFIED TYES	□ NO):						WORKT	ELEPHONE NUMBER:
JUVENILE	PARENT / GUARDIAN HOME ADDRESS (STREET, APARTM	ENT #, PO BOX, ETC.):	CITY:				STATE:	ZIP CODE:		HOME TE	LEPHONE NUMBER:
	(NAME): Inspector Sara Koch (NAME):	ADDRESS: 568 NE 2 ADDRESS	55th Street	t, Cross	City, Florid	ia 32628		·		TELEPHONE NUMBER: (352) 498-4741 TELEPHONE NUMBER:	
	(NAME):	ADDRESS:								TELEPHO	ONE NUMBER:
TNESS	(NAME):	ADDRESS:						6.1	77		ONE NUMBER:
WIT	(NAME):	ADDRESS:						<u>.</u>	100	TELEPHONE NUMBER:	
	(NAME):	ADDRESS:						0	1 23		
	(NAME):	ADDRESS:						-	7 5	TELEPHO	ONE NUMBER:
	OFFENSE DESCRIPTION: Staff Sexual Misconduct			☐ FELON ☐ MISDEI ☐ TRAFF			E STATUTE / ORD 14.35(3)(b)2		i o		VICTIM NOTIFICATION: ARREST: □ YES SO NO RELEASE: □ YES □ NO
CHARGE 1	CITATION Variou			or offense: Dus/Unknown Dus/Unknown Dus/Unknown Dus/Unknown		BAIL AMOUNT:	VICTIM'S TELEPHONE NUMBE 850-838-4000		UMBER:		
	(Inmate) DC	Taylo	(STREET, APAR r Correct Hampton	ional In			Perry		STATE: FL		ZIP CODE: 32348
	OFFENSE DESCRIPTION:			FELON	Υ	COMPLET	E STATUTE / ORDI	NANCE NUMBER	:		VICTIM NOTIFICATION: ARREST: ☐ YES Ø NO RELEASE: ☐ YES ☐ NO
CHARGE 2	☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVIL OF ☐ CAPIAS NUMBER:			TIME OF OFFENSE:				VICTIM'S TEL	TELEPHONE NUMBER:		
CHA	VICTIM (NAME):	ADDRE	ESS (STREET, A	PARTMENT N	UMBER, PO BOX	, ETC.):	CITY:		STATE:		ZIP CODE:

THE FOLLOWING INCIDENT OCCURRED AT (ADDRESS / LOCATION): 3449 SW State Road 26	CITY OF: Trenton	COUNTY OF: Gilchrist	STATE OF: Florida					
Your Affiant is Law Enforcement Inspector Mayuly Nodarse, of the Florida Department of Corrections, Office of the Inspector General, Criminal Investigations Bureau.								
Your Affiant submits that the Defendant—	-Shannon Allen—did vio	plate the following Florida State	Statute:					
FSS 944.35(3)(b)2, Staff Sexual Miscondu	ıct.							
On November 7, 2023, while reviewing JPAY emails, Inspector Sara Koch (Inspector Koch) identified emails between Academic Teacher Shannon Allen (Ms. Allen)—assigned to Lancaster Correctional Work Camp (LWC)—and Inmate (Inmate DC# DC# who was formerly housed at LWC. The emails contained evidence of a possible sexual relationship between the two while Inmate was housed at LCW.								
Information Notification System (MINS)	This information was received by the Office of the Inspector General (OIG) via the department's Management Information Notification System (MINS) # 1221718 on November 7, 2023, and assigned to Inspector Mayuly Nodarse (Inspector Nodarse) for criminal investigation in OIG #23-21586 on November 7, 2023.							
A search of the Corrections Data Center (CDC) indicated that in May of 2023, Inmate was housed a LCW while assigned to a work squad, consistent with when Ms. Allen Ms. Allen was a full-time Academic Teacher assigned to the education buildin within LCW.								
A search of JPAY, an internet-based sthrough video chat and email, which can account, revealed the following:								
An account was created by Ms. Allen on	September 22, 2023, in	n the name of Sara Lee.						
Written communication between Ms. Allen and Inmate was clearly established in September of 2023. In total, Ms. Allen sent 106 letters, to include (fully clothed, primarily head shot) photos of herself to Inmate between September 2023 and November 1, 2023. Inmate was transferred to Taylor Correctional Institution on September 20, 2023, and the two continued to communicate thereafter via phone call (Phone number on a phone Ms. Allen acquired for this sole purpose) and JPAY electronic correspondence. Prior 3 rd party communication, facilitated by Inmate father, began in May of 2023, and resumed in December 2023 upon awareness of this investigation when direct communication between the two ceased.								
Most of the emails were of a romantic in Nodarse reviewed were also various reinclude fellatio and sexual intercourse.			e emails Inspector and Ms. Allen, to					
In a JPAY email dated October 1, 2023,	Inmate stated	the following in part:						
"lol remember when we tried to watch a movie together?!? Lmfao! that was a good idea and it was kinda cute how I laid out a little spot on the floor for us to cuddle with the brown napkins and toilet paper as our pillows! but, like most things we attempted to do together, it didn't work out quite like we thought! I think we made it 10 or 20 minutes before I had to have you and by that point I was like to hell with the movie!!!"								
In a JPAY email dated October 2, 2023,	Inmate stated	the following in part:						
"This morning I thought of you when brothought of you!!! funny you say that to namely me (lol:-)) does not. well I can lie I love your skills in the department!	othpaste and/or toothb make you but its not so	rush makes you gag but I kno omething you just do unless I p	ow that other stuff, provoke it, lol. can't					

you'd say stuff like your mouth is small and there isn't a lot of room, Imao, but I became infatuated with your skills in that area! I think about that as much as the other stuff when I have an itch and I'm doing my thang to relieve pressure. :-) true story babe. No hands, extra wet while you are looking at me in my eyes!!! I am getting all hot and bothered just sitting here thinking about that!!! real shit baby! damn I so wish you were here right now and we had like an hour to ourselves! I know, I know, an hour wouldn't be enough time for everything I would be trying to do but I'd settle. Imfao! hell for the longest time you used to make me go in like 5 minutes or less! and I used to be so self conscious about that because I always want to do my part and please you. definitely not making sure you're happy in that area if I can't last more than 5 minutes! that's the power you have over me baby!"

In a JPAY email dated October 11, 2023, Ms. Allen (Sara Lee) stated the following in part:

"Love you so much my sweet man. This morning, as I still rested in bed, you were at the center of my thoughts. I thought of how it feels to be held in your arms, how you make me tingle when you talk low and growl in my ear. I thought a lot about how you like to, as you say, devour me and how wonderfully special you make me feel. I thought of how much I love to do that thing you like for me to do all wet and looking you in the eyes. I thought so much, I had to handle things...LOL."

much, I had to handle thingsLOL."
On October 21 st , 22 nd , and 29 th , of 2023, Ms. Allen sent photos of herself via JPAY to Inmate
On November 17, 2023, Inspector Nodarse conducted a brief sworn, recorded interview with Inmate at Taylor Correctional Institution. Inmate expressed that he did not wish to provide an official statement except to state the following:
Inmate In
Post-recording, Inmate agreed to speak informally, and did admit to a romantic personal relationship with Ms. Allen, however he denied a sexual relationship both on and off recording.
On November 20, 2023, Inspector Nodarse conducted a sworn, recorded, post-Miranda interview with Academic Teacher Shannon Allen who stated the following in part:
Ms. Allen was presented with a JPAY print out of an email dated October 1, 2023, between her and Inmate wherein Inmate refers to both of them "cuddling" and watching a movie together and him "having to have her" 10 minutes into the movie on an unspecified date. Ms. Allen
On December 13, 2023, Inspector Nodarse conducted a second sworn, recorded, post-Miranda interview with Academic Teacher Shannon Allen who stated the following in part:
Inspector Nodarse presented Ms. Allen with an email written by Inmate on October 2, 2023, referring to her performing fellatio on him. At that time, Ms. Allen
Based on the physical and testimonial evidence as well as Me. Allen's admission, your Afficht respectfully

Based on the physical and testimonial evidence as well as Ms. Allen's admission, your Affiant respectfully submits that probable cause is established that Ms. Allen did commit the following offense:

SEXUAL MISCONDUCT: "Sexual misconduct" means the oral, anal, or female genital penetration by, or union with, the sexual organ of another or the anal or female genital penetration of another by any other object but does not include an act done for a bona fide medical purpose or an internal search conducted in the lawful performance of the employee's duty.

	944.35 Authorized use of force; malicious battery and penalties.—	d sexual mis	sconduct prohibited;	reportir	ng requi	ired;
	"Any employee of the department or a private correction sexual misconduct with an inmate or an offender super committing the crime of sexual battery, commits a felos. 775.082, s. 775.083, or s. 775.084.	vised by the	department in the	commu	nity, wit	hout
	3. The consent of the inmate or offender supervised by a misconduct may not be raised as a defense to a prosecution	•	-	to any a	act of se	exual
	Your Affiant further respectfully submits that probable causarrest warrant be issued for the arrest of Ms. Shannon Alle for the following violation of Florid	en, DOB	who resides at	her requ	iests tha	at an
	FSS 944.35(3)(b)2, Staff Sexual Misconduct.					
•	MANDATORY APPEARANCE IN COURT AT:		DATE OF APPEARANCE:	TIME OF A	PPEARANCE:	AM
NTA	I AGREE AND PROMISE TO COMPLY AND ANSWER TO THE CHARGES AND INSTRUCTIONS SPECIFIED IN THIS NOTICE TO APPEAR. WILLFUL REFUSAL TO ACCEPT AND SIGN THIS NOTICE TO APPEAR MAY RESULT IN PHYSICAL ARREST. I UNDERSTAND MY SIGNATURE IS NOT AN ADMISSION OF GUILT OR WAIVER OF MY RIGHTS.	DEFENDANT (SIG	NATURE):		DATE:	
	SWORN TO AND SUBSCRIBED BEFORE ME THIS: DAY OF January 2024	CORRECT TO THE BEST	ID REVERSE AND ATTACHED PAGES AND OF MY KNOWLEDGE AND BELIEF.	STATEMENTS	ARE TRUE AND	
JURAT	SIGNATURE:	NAME (PRINT): INSP	ector Mayuly Nodarse			
3	TITLE: Sr, Faispertor	AGENCY: FDC -	OIG LEO ID NUMBER:			
					<u> </u>	