

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PINELLAS COUNTY

AFFIDAVIT AND APPLICATION FOR SEARCH WARRANT
STATE OF FLORIDA COUNTY OF PINELLAS

Before me, the undersigned Judge, Circuit Court Judge of the Sixth Judicial Circuit in and for Pinellas County, Florida, personally appeared Investigator Ralph Pflieger, Criminal Investigator for the Office of the Public Defender, Sixth Judicial Circuit of Florida, who by me first being duly sworn, deposes and says that he believes and has good reason to believe that located at 1458 South Jefferson Avenue, Clearwater, Pinellas County, Florida, there is evidence the Laws of Florida pertaining to Armed Robbery in violation of Florida Statute 812.13(2)(a) have been violated and there are instrumentalities or means by which the crime of Armed Robbery has been committed or evidence relevant to proving said Armed Robbery is contained within said dwelling. Your affiant Pflieger's reason for this belief are as follows:

The address of 1458 South Jefferson Avenue, Clearwater, Florida is further described as a single story, single family dwelling house located on the west side of South Jefferson Avenue, south of its intersection with Bellevue Street in the unincorporated area of Pinellas County. The structure is pink in color with darker pink trim. The front entry door consists of a white colored door with screened window and a pink colored wooden door on the east side of the building near the center. A black rural delivery mailbox atop an unpainted wooden posts sits astride the east easement of the property along Jefferson Avenue. The numerals "1458" in black lettering on a gold background are affixed to the north side of this mailbox. A concrete driveway leads from Jefferson Avenue to a garage located near the north end of the dwelling. There are three potted plants in round pots near the stoop at the front entrance and the rear yard of the dwelling is surrounded by a wooden fence. There is a vacant lot to the immediate north of this property. This dwelling is in the care, custody and control of Brenda Craughan, AKA Brenda H. Austin, according to the tax rolls of Pinellas County, and is further described as Section 22, Township 29, Range 15, Subdivision 79480, Block 001, Lot 0170, or Sall's Subdivision, Block A, Lot 17, in Pinellas County, Florida. Your Affiant has reason to believe the clothing worn by the perpetrator of these armed robberies is located at 1458 South Jefferson Avenue, Clearwater, Pinellas County, Florida:

1. Fuschia colored shirt.
2. Purple colored shirt.
3. Grey or blue sweat pants.
4. Dark colored ball cap.
5. White colored high-top sneakers.
6. Wrap around Oakley style sunglasses.
7. Cloth gloves.
8. White shorts.
9. Dark pants.
10. Rust colored long sleeve shirt.
11. Denim shirt.

Your Affiant's reason for this belief are

1. On April 9, 1997 counsel for defendant, Chris Helinger and Ralph Pflieger, investigator for the Public Defenders Office, met with Kari Forcella, ex-girlfriend of Michael Sean Ritter.
2. Michael Sean Ritter is currently incarcerated in the Pinellas County Jail charged with first degree and bank robbery. He has been incarcerated since January 2, 1997.
3. The Public Defenders Office was appointed to represent Joseph Lawson on November 18, 1997.
4. Joseph Lawson is charged with four armed robberies and sexual assault at beach motels, occurring from August 30, 1996 to October 8, 1996.
5. It came to the attention of Defendant's counsel that there is striking similarity between the appearance of Mr. Ritter and Mr. Lawson.
6. The only evidence inculpatory Mr. Lawson in the robberies is the victim's photo pack identification.
7. During the course of Discovery it would seem that the victims of the four robberies were presented many

photo packs before making a photo identification.

8. At least one victim thinks she may have seen at least 100 photos before making a photo identification.
9. Two of the victims have indicated that the perpetrator wore either a purple or fuchsia short sleeve shirt.
10. All four victims have indicated the perpetrator had a silver, small caliber pistol.
11. An independent witness has indicated that she observed the suspect and a small white car with a red decal in the rear window in the vicinity of the robbery at the same time.
12. The robberies generally occurred between 5:30 p.m. and 9:30 p.m. in the evening.
13. Kafi Forcella resided with Michael Sean Ritter from early May of 1996 until January 1, 1997.
14. Ms. Forcella worked at the Largo Medical Center on the 3:00 p.m. to 11:30 p.m. shift during the time period when the robberies were committed.
15. Ms. Forcella owns and drives a small white car with a red and black decal on the upper left corner of the rear window. The decal was on the car when the robberies were committed.
16. Her boyfriend, Michael Sean Ritter frequently borrowed her car in the evening while she was working.
17. During the time they lived together, and during the time frame of the robberies, Mr. Ritter worked on the beach and drove from Dunedin to Pass-A-Grille Beach, obviously passing by the beach motels.
18. Prior to living with Ms. Forcella in May of 1996, Mr. Ritter lived with his step-mother on Madeira Beach, very close to one of the robberies.
19. Mr. Ritter has cotton gloves, the perpetrator wore cotton gloves, in some of the robberies.
20. Mr. Ritter had a purple shirt and a fuschia shirt.
21. The purple and fachsia shirts are at his sister's home, at 1458 South Jefferson, Clearwater, Flofida.
22. The fuschia shirt was described by one of the victims and Ms. Forcella as having a logo on the left breast.
23. Ms. Forcella packed up the purple and fuschia shirts after her boyfiends arrest and delivered them next door to his sister's house.
24. According to Ms. Forcella, Mr. Ritter's father is coming next week or late this week to pick up his clothing.
25. Mr. Ritter stored a mask, gloves, the fuschia shirt, a black ski mask, grey sweat pants and a white tank top in the trunk of her automobile. Ms. Forcella would frequently check the contents of the bag and would always find these items in the bag during the times the robberies occurred.
26. Mr. Ritter owned a small caliber, silver automatic pistol.
27. In November, 1996, after the robberies, Mr. Ritter told Ms. Forcella he had thrown the gun in the lake because he didn't need it anymore.
28. After Mr. Ritter was arrested in January, 1997 he told Ms. Forcella to retrieve the small, silver gun from a field next to his sisters house.
29. Ms. Forcella, Mr. Ritter's girlfriend and Brenda Craughan, Mr. Ritter's sister, went to the field and retrieved the gun.
30. A few days later Ms. Forcella turned the gun over to law enforcement.
31. During the time period the robberies were committed, Ms. Forcella was watching the six o'clock news with Mr. Ritter and there was a segment concerning a beach robbery. Ms. Forcella indicated the description of the robber, including the clothes, fit Mr. Ritter. Mr. Ritter. She looked at Mr. Ritter and said it could be you. According to Ms. Forcella, Mr. Ritter just smiled.
32. According to one of the victims the perpetrator had a southern accent. Mr. Ritter previously lived in Alabama and served a lengthy prison sentence for three counts of robbery in that state.
33. When Mr. Forcella went to visit Mr. Ritter in the Pinellas County Jail, after his January arrest he eluded to having significant funds stashed away. He told her that he had done more robberies.
34. On April 10, 1997, your Affiant spoke with Ms. Forcella and asked her when she had packed up the clothes and gave them to Mrs. Ritter's sister. She said around the first of January, 1997. She knows the clothes are in the residence as about two weeks ago she spoke to Mr. Ritter's niece as well as his step-mother. Both indicated that the clothes are still there, and Mr. Ritter's father is coming to pick them up late this week or next week.
35. Additionally, Ms. Forcella said she packed a high-top pair of white Nikes, wrap around Oakley style sunglasses, gray sweat pants, cloth gloves, white shorts, dark pants, a fuschia and a purple colored shirt. All of these items are listed in the police reports as clothing wom by the perpetrator during the course of these robberies. She also indicated that Mr. Ritter frequently wore a denim shirt.
36. The only clothing item not mentioned by Ms. Forcella included in police report clothing descriptions is a rust colored long sleeved shirt allegedly wom in the Sands of Madeira robbery.

37. Your affiant Pflieger spoke with Public Defender Investigator Bernadette Brewster and learned that she had a conversation with Michelle Jacks a victim in the robbery of the Holiday Inn on Treasure Island on August 30, 1996.

38. Jacks indentified to Brewster the shirt worn by the perpetrator as fuschia in color.

39. During the course of the interview between Jacks and Brewster Jacks inadvertently saw a copy of Mr. Ritter's booking photograph and said "that's him".

40. Jacks described to Brewster the perpetrator's pants as shiny, dark jogging type pants and his shoes as white high-top sneakers.

Your Affiant believes that Michael Sean Ritter was involved in the four beach robberies, i.e. Holiday Inn, Treasure Island; Sands of Madeira, Madeira Beach; Roadway Inn Treasure Island; the clothing that he wore when he committed these robberies is to be found in his sister's residence, Brenda Craughan. WHEREFORE, your Affiant prays that a Search Warrant be issued according to the laws commanding all and singular the Sheriff and/or Deputy Sheriffs of Pinellas County, Florida, or an Police Officer of Clearwater, Pinellas County, Florida, either in the daytime or the nighttime, with the proper and necessary assistance, to search persons thereon, reasonably suspected of being involved in the illegal activity which is the subject of this warrant, and seize as evidence the herein described in order that the evidence may be procured to be used in the prosecution of such person or persons to be involved in the illegal activity as alleged.

AFFIANT

Sworn to and subscribed before me this day of 1997.

CIRCUIT JUDGE
SEARCH WARRANT

STATE OF FLORIDA

COUNTY OF PINELLAS

TO THE SHERIFF AND/OR DEPUTY SHERIFF OF PINELLAS COUNTY FLORIDA, AND ANY POLICE OFFICER OF THE CITY OF CLEARWATER, FLORIDA

The attached Affidavit for Search Warrant coming on to be heard and the Court having examined the Affiant under oath and having been satisfied that the facts as alleged do exist and that the law is being violated as alleged, a Search Warrant is hereby allowed and issued to search the premises described in the Affidavit for Search Warrant: to-wit: 1458 South Jefferson Avenue, Clearwater, Pinellas County, Florida and is further described as a single story, single family dwelling house located on the west side of South Jefferson Avenue, south of its intersection with Bellevue Street in the unincorporated area of Pinellas County. The structure is pink in color with darker pink trim. The front entry door consists of a white colored door with screened window and a pink colored wooden door on the east side of the building near the center. A black rural delivery mailbox atop an unpainted wooden posts sits astride the east easement of the property along Jefferson Avenue. The numerals "1458" in black lettering on a gold background are affixed to the north side of this mailbox. A concrete driveway leads from Jefferson Avenue to a garage located near the north end of the dwelling. There are three potted plants in round pots near the stoop at the front entrance and the rear yard of the dwelling is surrounded by a wooden fence. There is a vacant lot to the immediate north of this property. This dwelling is in the care, custody and control of Brenda Craughan, AKA Brenda H. Austin, according to the tax rolls of Pinellas County, and is further described as Section 22, Township 29, Range 15, Subdivision 79480, Block 001, Lot 0170, or Sall's Subdivision, Block A, Lot 17, in Pinellas County, Florida.

THESE PRESENTS, THEREFORE, are to command you with the necessary and proper assistance as the exigencies of the occasion may demand or require, either in the daytime or the nighttime, and on any day of the week, including Sunday, in or on said premises and the curtilages thereof, there to diligently search for the herein described fuchsia colored shirt, purple colored shirt, grey or blue sweat pants, dark colored ball cap, white colored high-top sneakers, wrap around Oakley style sunglasses, cloth gloves, white shorts, dark pants, rust colored long sleeve shirt, and a denim shirt.

YOU ARE ORDERED to allow a representative from the Public Defender's Office, Sixth Judicial Circuit to be present during the execution of the warrant. YOU ARE FURTHER ORDERED to deliver a true copy of this Search Warrant with an inventory of the property seized to any person to be in control of the above described residence, and in the absence of such person, to leave a copy of this Search Warrant with an inventory of the property seized at the above described residence.

CIRCUIT JUDGE
PINELLAS COUNTY, FLORIDA

DONE AND ORDERED THIS DAY OF APRIL, 1997.