

AFFIDAVIT FOR SEARCH WARRANT (continued)

4. The material facts constituting probable cause that the search should be made are: (cont.)

1) On 01/28/08 at approximately 5:45am, Roanoke County Police were called to the 5200 block of Springlawn Avenue in Roanoke County where the body of man had been found lying in the street. The investigation revealed that the body had been discovered by a nearby resident, who immediately called the police. The investigation further revealed the body to be that of Thomas Farrell, age 49, who was an avid runner. Ferrell was found to be wearing an orange colored reflective vest. It was learned that Ferrell ran nearly every morning and that one of the routes that he ran included Springlawn Ave.

2) The investigation revealed that Farrell had been struck by some type of automobile or truck and that the vehicle had left the scene without reporting the crash or summoning help for Farrell. Farrell died at the scene.

3) Over the next several days, county police received numerous tips regarding the death of Farrell. Among them were at least three tips that mentioned a white Jeep with a black top which had been observed nearby the crash site over a period of several days prior to the crash. One of the tips mentioned the possibility that the driver of the Jeep had been involved in some sort of previous altercation with a jogger. A tip mentioned that the white Jeep had been observed at the Country Store lot on Starkey Road and Penn Forest Boulevard during the morning on 01/28/2008 with damage to the front.

4) On 01/30/2008, county police received information from Floyd County Sheriff's Office (FCSO) regarding an arrest made in Floyd County on that date. FCSO advised that deputies had arrested Jeffrey Martin YOUNG during an incident in which he had used a motor vehicle to strike a pedestrian in Floyd County, and then subsequently beat the pedestrian with a stick. Although YOUNG was operating another vehicle belonging to a family member at the time of this incident, YOUNG was known by FCSO deputies to operate a white Jeep – the vehicle to be searched.

5) Roanoke County Police had been involved in several contacts with YOUNG over the previous several days. The most recent of which had been at the aforementioned Country Store lot at approximately 3:00am on the morning of 01/28/2008, shortly before Farrell was killed. At that time, YOUNG was operating the vehicle to be searched.

6) County police were unable to account for the whereabouts of the white Jeep and began a search for the vehicle.

7) On 02/04/2008, county police began to contact tow services in the Roanoke area by phone. Upon contacting Robert Young Towing, it was learned that the vehicle to be searched was in their possession on their lot at 210 Carver Avenue NE in the City of Roanoke. The Affiant proceeded to the lot and confirmed that the vehicle to be searched had damage to the front. There are paint shards turned upward exposing unruined bare

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metal, suggesting that the damage is recent. There were reddish orange marks on a headlight similar in color to the reflective safety vest worn by Farrell at the time of the crash.

8) County police learned from the tow company that the vehicle to be searched had been towed from the lot of a private business near the Country Store on 01/29/2008 as an abandoned vehicle.

9) Based on the facts above, the Affiant submits that it is reasonable to believe that the vehicle to be searched was involved in the hit & run crash that killed Farrell.

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