

25-06211-CF

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January 27, 2026

LT Kevin J. Griffin
Staff Attorney
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Southeast District Legal

Sent via email to: Kevin.J.Griffin@USCG.MIL

Re: Subpoenas for Brian Knapp, Kyle Quimby, Ronald Gleason, Brandon Maddox and Justin Cooksie

Dear Lieutenant Griffin,

I received your email enclosing Staff Judge Advocate Blackburn's letter explaining that our prior request for depositions did not comply with the applicable procedures. I appreciate the clarification and the opportunity to correct those issues. Please treat this letter as the defense's formal request for official information and testimony pursuant to the Department of Homeland Security *Touhy* regulations, including 6 C.F.R. Part 5, Subpart C, and 33 C.F.R. § 1.20-1, in connection with a pending criminal prosecution arising out of the Clearwater Ferry Collision.

This matter is a criminal case currently pending in the Sixth Judicial Circuit in and for Pinellas County, Florida, styled State of Florida v. Jeffrey David Knight, Case No. 25-06211-CF. The prosecution concerns the facts and circumstances of the April 27, 2025 collision involving Mr. Knight's vessel and the commercial ferry, *Maddie's Crossing*, and the ensuing response and investigation conducted by the United States Coast Guard in Clearwater, Pinellas County, Florida.

The defense seeks authorization for testimony from the following Coast Guard members: Brian Knapp, Kyle Quimby, Ronald Gleason, Brandon Maddox, and Justin Cooksie. These individuals have been identified by the State Attorney's Office as Category A witnesses pursuant to Florida Rule of Criminal Procedure 3.220(b)(1)(A)(i), meaning they are known to the prosecutor to have information that may be relevant to one or more offenses charged or to potential defenses.

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The anticipated testimony is narrowly limited to each witness's personal observations, actions, and involvement in the response to and investigation of the Clearwater Ferry Collision, including scene observations, vessel conditions, witness contacts, statements obtained, and investigative steps taken contemporaneously with the incident.

Other than Brian Knapp, no expert opinion testimony is anticipated, and no testimony is requested regarding deliberative processes, internal recommendations, or privileged communications. With respect to Officer Knapp, the testimony sought is limited to the same scope of expert testimony previously authorized by the Department at the request of the State and is confined to factual, percipient matters. The defense does not seek to expand, revisit, or duplicate the scope of any prior authorization granted by the Department.

The Coast Guard investigation remains ongoing, and the Coast Guard's investigative report has not yet been disclosed. Because the scope of that investigation and the roles played by the identified Coast Guard members are information uniquely within the control of the Coast Guard, the defense cannot determine from existing discovery the full extent of each member's involvement or the factual information obtained by them. That circumstance makes limited factual testimony necessary to identify what investigative actions were taken, what information was received, and what witness contacts or observations were made, and to ensure that potentially material factual information is available to the defense in a pending criminal prosecution.

Accordingly, this request seeks narrowly confined factual testimony now, subject to reasonable scope limitations, to permit the defense to understand and test the factual basis of the government's investigation. This request is made with full recognition of the Coast Guard's authority under applicable regulations to impose reasonable conditions or limitations. The undersigned is prepared to cooperate in good faith to narrow scope or sequence witnesses as appropriate to address agency concerns.


If authorized, the testimony would be taken by deposition at a mutually agreeable time and location, subject to reasonable limitations as to scope, duration, and sequencing as the Coast Guard may determine are appropriate under applicable regulations.

With respect to prior deposition efforts, no subpoenas directed to Coast Guard members were filed with the court. The only filings made were Notices of Taking Deposition. In deference to the *Touhy* regulations and agency direction, those Notices of Taking Deposition have been cancelled, and a copy of the filed Notice of Cancellation of Depositions is enclosed for the agency's records. The defense will proceed solely in accordance with the *Touhy* regulations and will not seek testimony or documents from Coast Guard personnel except as authorized by the Department.

Please advise if any additional information is required to facilitate review of this request, and if Staff Judge Advocate Blackburn is the proper person to send this to, I would appreciate you forwarding this to her as I do not have her email address.

Thank you for your assistance and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Hayslett', with a stylized flourish at the end.

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