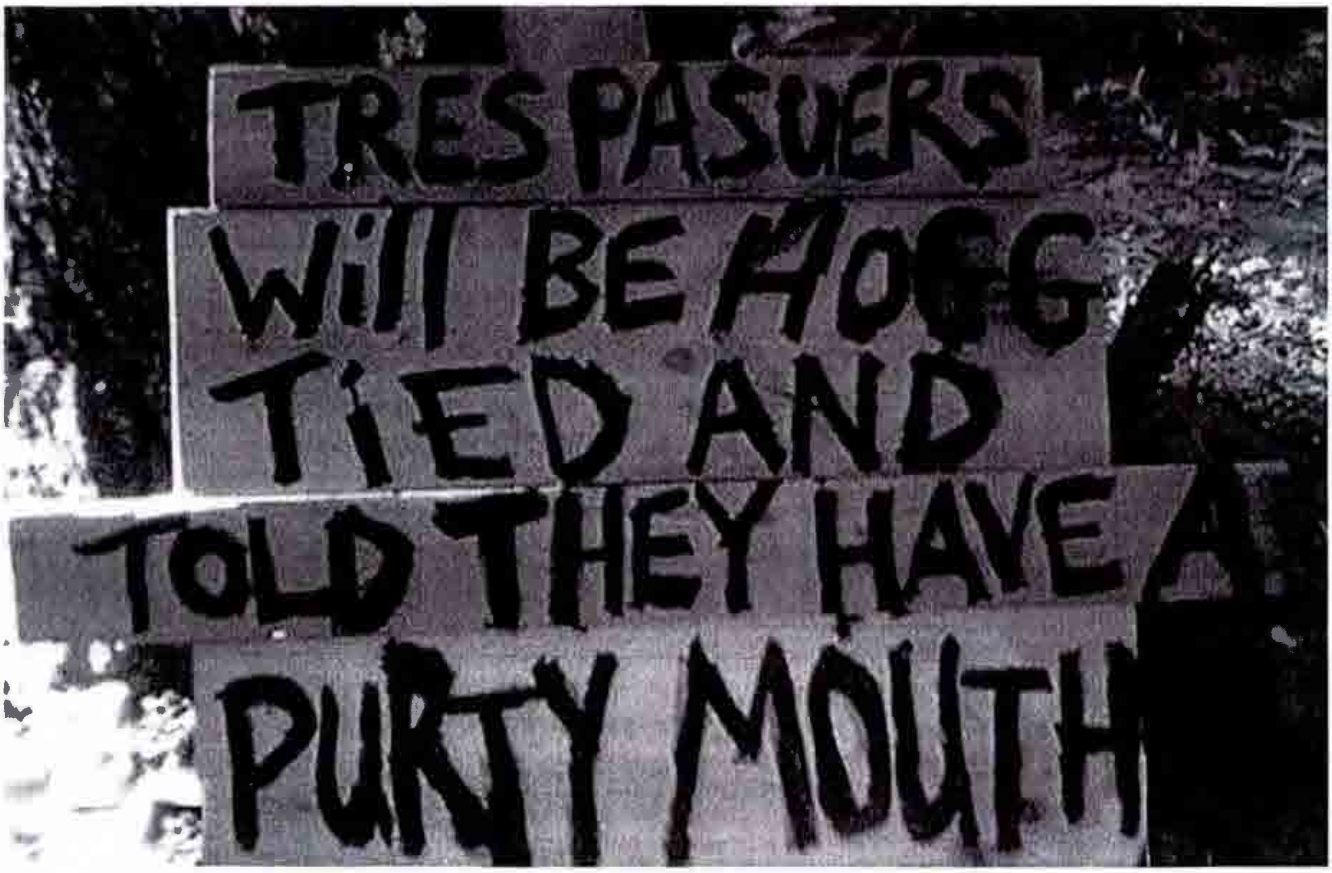

TRESPASUERS
WILL BE HOGG
TIED AND
TOLD THEY HAVE A
PURTY MOUTH

234

Jeff Fenton

From: Fawn Fenton
Sent: Friday, July 24, 2015 1:49 PM
To: Jeff Fenton
Subject: RE: Hello :)

Yow!

;)

From: Jeff Fenton
Sent: Friday, July 24, 2015 1:48 PM
To: Fawn Fenton
Subject: Hello :)

http://cdn.wideopenspaces.com/wp-content/uploads/2015/01/No-Trespassing-44.jpg

Jeff Fenton
Meticulous Marketing LLC
(615) 837-1300 Office
(615) 837-1301 Mobile
(615) 837-1302 Fax

When it's worth doing RIGHT the first time!

Submit or respond to a support ticket here.

12/3/2015 4:23 PM (PNG Image, 957 × 504 pixels)

Home | Custom | No Trespassing | Private Property | Video Surveillance | No Soliciting | Security Camera | Beware of Dog | Designer

Home > CCTV Signs > DP-3064

2" x 6" Custom CCTV Symbol Sign

Create Your Sign

Write and edit your sign. Make sure to consult our help by clicking on the ? buttons. Click Next Step when done.

Enter Your Text

Enter the text and adjust font size and style if desired.

Text 1 NO TRESPASSING
24/7 Audio & Video
Surveillance

Auto Fit

Preview | Save | Edit Design ? | Spell Check

Select a Sign Color

Choose a color for your sign.

TEXT Black | TEXT Red | TEXT Dark Blue

Back | Next Step

My Security Sign

300 Cadman Plaza West, Suite 1303, Brooklyn, NY 11201

Invoice

Questions? Call (800) 952 1457

Bill To	Ship To
Fawn Fenton	Fawn Fenton
1986 Sunny Side Dr.	1986 Sunny Side Dr.
Brentwood, TN 37027	Brentwood, TN 37027
Phone: 615-[redacted]	Phone: 615-[redacted]
Email: accounts@fentonmail.com	Email: accounts@fentonmail.com

Order No.: MSS-111910 Date: November 24, 2015 Ship by: UPS Regular

Item Description	Unit Price	Qty.	Amount
1. No Trespassing, This Property Is Protected By Video Surveillance, Trespassers will be Prosecuted Sign (with Graphic) Color: Green Reversed Size: 12" x 18" (H x W) Part #: K-4574 • HTC Code: 8310.00.00.90	$28.59/Sign Package: 1 Sign	1 Sign	$28.59

Product Subtotal :	$28.59
Estimated Shipping Charges :	Free
Order Total :	**$28.59**

Please make checks payable to **SmartSign**.

Print Page Close Window

PayPal

November 24, 2015

XpressMyself.com LLC - $28.59
Authorization

This is a temporary authorization to make sure your payment method will cover the payment. Your payment method will be charged when XpressMyself.com LLC completes your order.

Paid with
VISA x-6593

Ship to
Fawn Fenton
1986 Sunny Side Dr.
Brentwood, TN 37027
United States

Transaction ID
1G6000416Y163691M

Seller info
XpressMyself.com LLC
(718) 797-1900
customerservice@smartsign.com

Your purchase

XpressMyself.com LLC	$28.59
Shipping	$0.00
Tax	$0.00
Purchase total	$28.59
Fee	$0.00
Total	**$28.59**

HIKVISION

WILLIAMSON CO. CLERK & MASTER
2019 AUG 29 AM 9:20
FILED FOR ENTRY

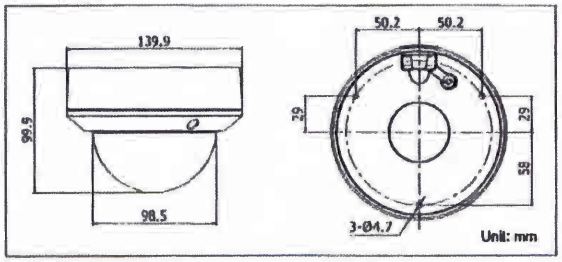
DS-2CD2742FWD-IZS

4 MP WDR Dome Network Camera with IR

Key Features

- 4 Megapixel High Resolution
- Full HD1080p Video
- Dual Video Streams
- 2.8 mm to 12 mm Motorized Lens
- 120 dB Wide Dynamic Range
- 3D Digital Noise Reduction
- Smart Features
- PoE (802.3af)
- IR Range 30 Meters (~100 feet)
- IP66 and IK10 Protection
- Audio and Alarm Input/Output
- Edge Storage, MicroSD Slot, 128 GB

Dimensions



Accessories

RCM-1 In-Ceiling Mount | PC135 + WMS Pendant Cap With Wall Mount | AB135 Angled Base | SRSL Rain Shade | CB135 Conduit Base

DS-2CD2742FWD-IZS	
Camera	
Image Sensor	1/3" progressive scan CMOS
Minimum Illumination	Color: 0.014 lux @ (f/1.4,AGC on); B/W: 0 lux with IR
Shutter Speed	1/3 s to 1/10,000 s
Slow Shutter	Yes
Lens	2.8 mm to 12 mm @ f/1.4, motorized lens
Angle of View	112° to 33.8°
Lens Mount	Φ14
Day/Night	IR cut filter with auto switch/schedule/triggered by alarm
Digital Noise Reduction	3D DNR
Wide Dynamic Range	120 dB
Pan/Tilt /Rotation	Pan: 0° to 355°, tilt: 0° to 75°, rotation: 0° to 355°
Compression Standards	
Video Compression	H.264+/H.264/MJPEG
H.264 Type	Main Profile
Video Bit Rate	32 Kbps to 16 Mbps
Dual Streams	Yes
Audio	G.711/G.722.1/G.726/MP2L2, 64 Kbps (G.711)/16 Kbps (G.722.1)/16 Kbps (G.726)/32 to 128 Kbps (MP2L2)
Image	
Maximum Resolution	2688 × 1520
Frame Rate	20 fps (2688 × 1520), 30 fps (1920 × 1080, 1280 × 720)
Image Settings	Compression, color, saturation, brightness, contrast, sharpness, rotate mode, privacy mask
Backlight Compensation	Yes, zone configured
Region of Interest (ROI)	Yes
Analytics	
Smart Features	Line crossing detection, intrusion detection
Network	
Network Storage	NAS (supports NFS,SMB/CIFS); ANR
Alarm Triggers	Motion detection, line crossing detection, intrusion detection, tamper alarm, network disconnect, IP address conflict, storage exception
Protocols	TCP/IP, UDP, ICMP, HTTP, HTTPS, FTP, DHCP, DNS, DDNS, RTP, RTSP, RTCP, PPPoE, NTP, UPnP, SMTP, SNMP, IGMP, 802.1X, QoS, IPv6, Bonjour
Security	Three level user authentication, password authorization, HTTPS and SSH certificate, IEEE802.1X, basic and digest authentication, watermark, IP address filtering, log-in lockout
Standards	ONVIF (PROFILE S, PROFILE G), PSIA, CGI, ISAPI
Interface	
Communication	1 RJ-45 10M/100M Ethernet port
On-Board Storage	Built-in microSD/SDHC/SDXC slot, up to 128 GB
Alarm	1 alarm I/O
Audio	1 audio I/O
General	
Operating Conditions	-30° C to 60° C (-22° F to 140° F), humidity 95% or less (non-condensing)
Power	12 VDC ±10%, PoE (802.3af) UL/cUL Listed
Power Consumption	Maximum 5.5 W
IR Range	30 meters (~100 feet)
Ingress Protection	IP66
Impact Protection	IEC60068-275Eh, 20J; EN50102, up to IK10
Dimensions	Φ140 mm × 99.9 mm (Φ5.51" × 3.94")
Weight	1000 g (2.20 lbs)

Order Model

DS-2CD2742FWD-IZS

Hikvision USA Inc., 908 Canada Court, City of Industry, CA 91748, USA • Hikvision Canada, 4485 Dobrin, St-Laurent
Tel: +1-909-895-0400 • Toll Free in USA: +1-866-200-6690 • E-Mail: sales.usa@hikvision.com • www.hikvision.com
© 2015 Hikvision USA Inc. • All Rights Reserved • Specifications subject to change without notice.

CHANCELLOR MICHAEL W. BINKLEY
Williamson County Chancery Court

EXHIBIT - H

239

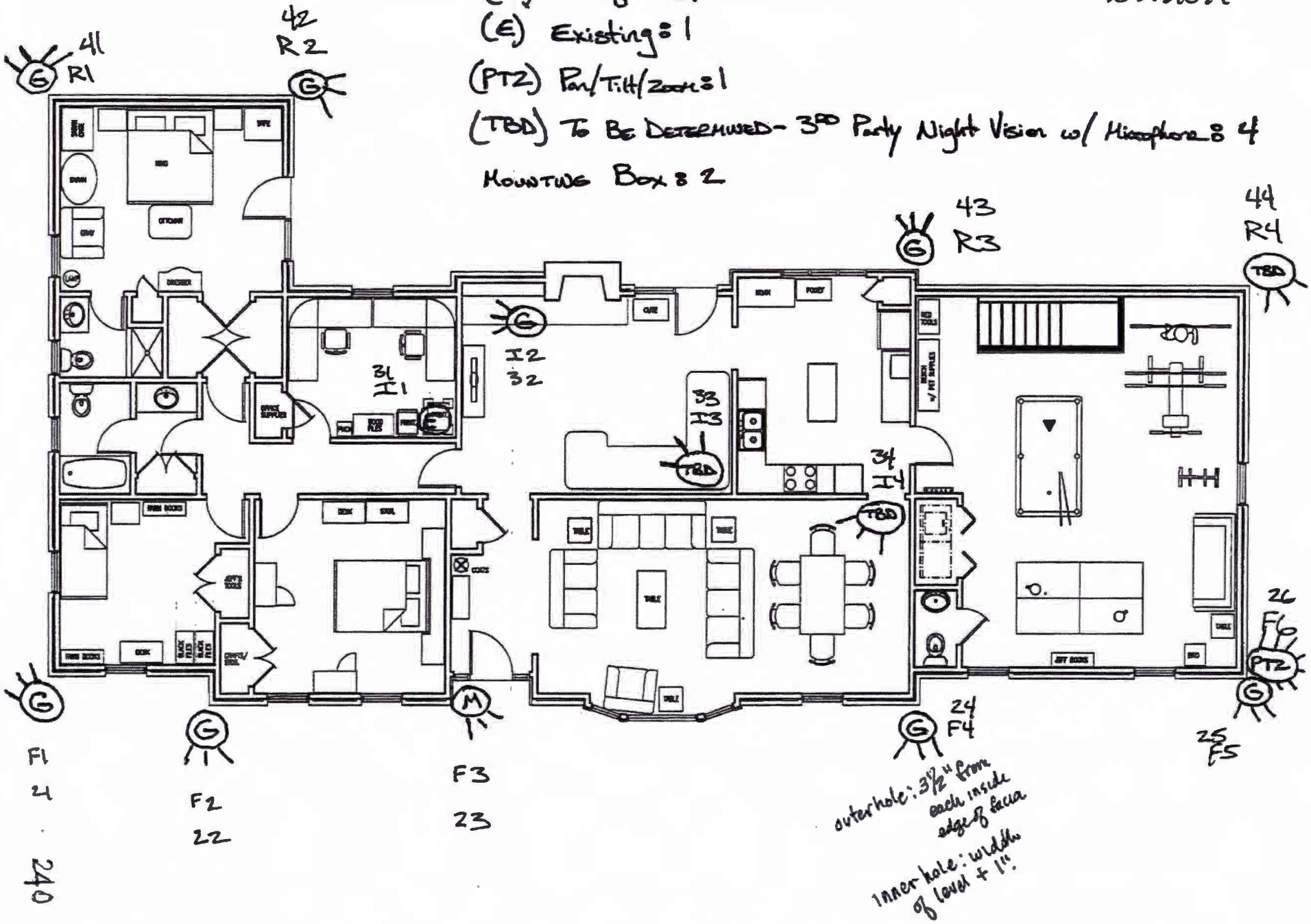
RE: Fenton v Fenton Case# 48419B

2016 Surveillance Camera Layout

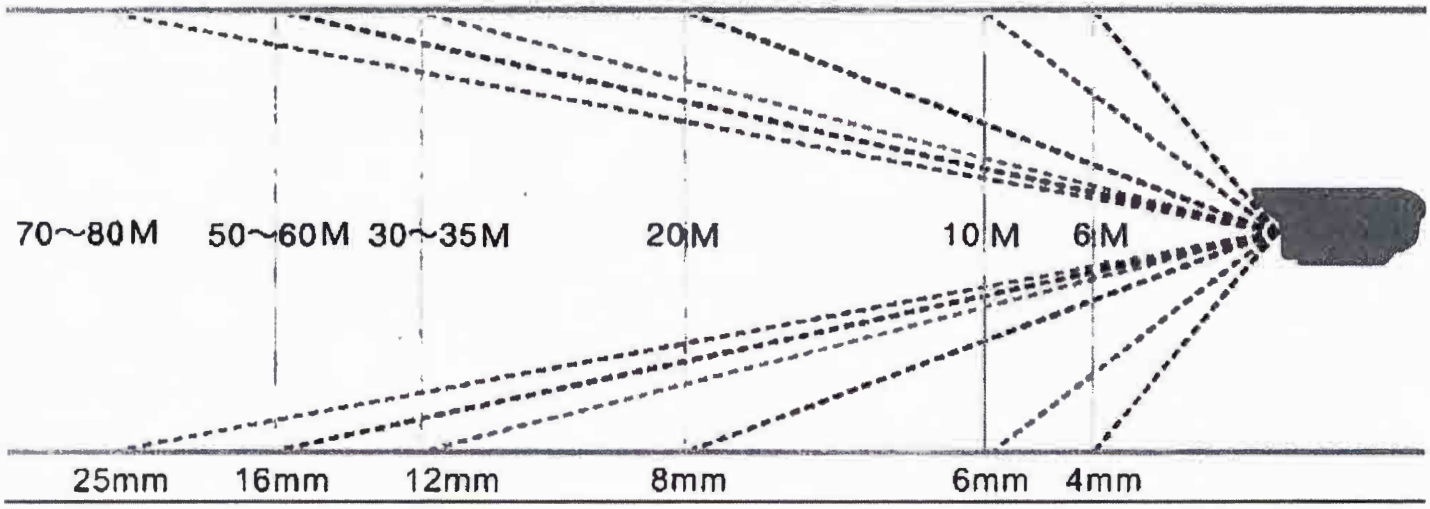
INSIDE GARAGE: 1 TBD

(G) GUARDIAN: 8
(M) Mosquito: 1
(E) Existing: 1
(PTZ) Pan/Tilt/Zoom: 1
(TBD) To Be Determined - 3RD Party Night Vision w/ Microphone: 4
Mounting Box: 2

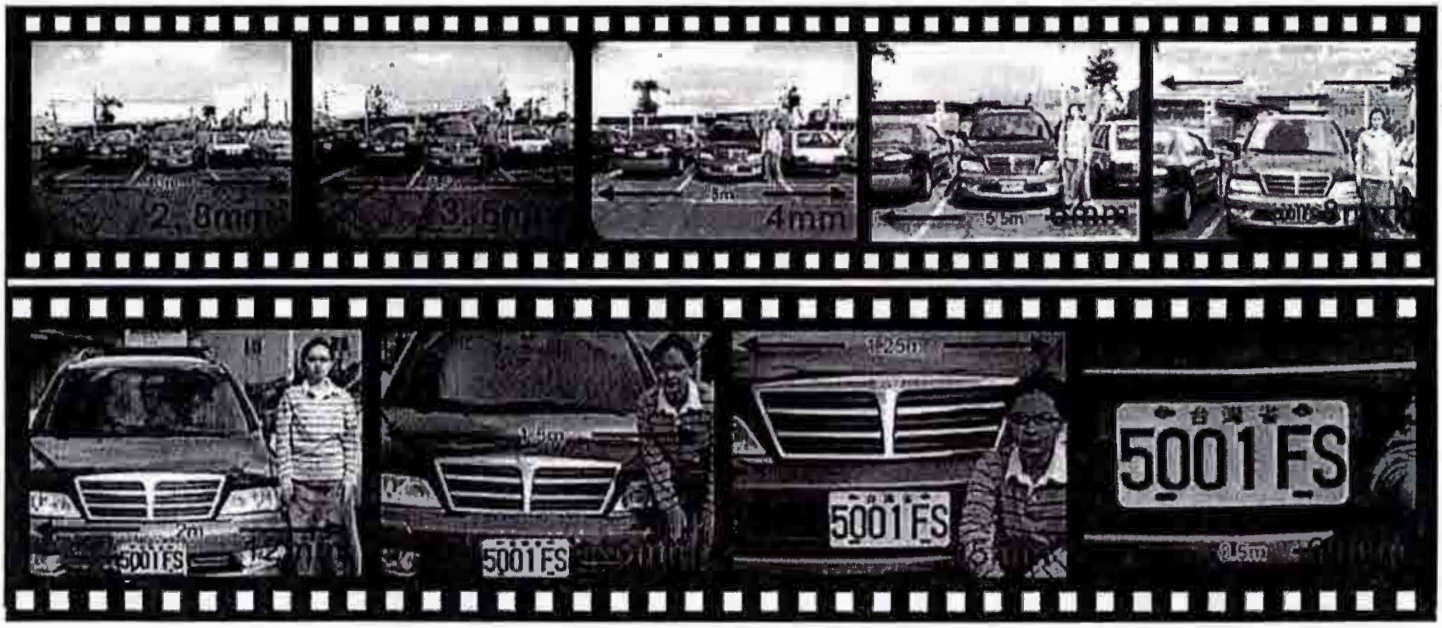
8.8.8.8.
8.8.4.4
10.1.10.1



Lens Size	2. 5mm	2. 8mm	3. 6mm	4mm	6mm	8mm	12mm	16mm	25mm	60mm
View Angle	100°	90°	75°	70°	60°	40°	30°	20°	12°	5°
see clearly the number plate from	1.5M	2M	2.5M	3M	5M	7M	10M	20M	25M	50M
Cover Distance			5	6	10	20	30~35	50~60	70~80	



Pictures taken by the same camera with different size lens



241

< < SALES ORDER > >

AUDIO VIDEO SUPPLY, INC.
4575 RUFFNER ST.
SAN DIEGO CA 92111

MET44

Sold To: METICULOUS PROFESSIONAL SOLUTIONS
1986 SUNNY SIDE DR.
BRENTWOOD TN 37027

Ship To: METICULOUS PROFESSIONAL SOLUTIONS
1986 SUNNY SIDE DR.
BRENTWOOD TN 37027

Phone: 615-837-1300

Order No.	Order Date	Loc ID	Terms	Customer P.O.#	Ship Via	Sls	Pg
00126676	01/20/16	A-STK	Credit Card	********	BESTWAY FOB AVS	T02	1
				VERBAL / J.FENTON MA			

	Item No/Description	Units	Qty Ord	Qty Shp	Qty Bko	Unit Price	Extended Price
001	DS2CD2742FWDIZS 4MP WDR DOME NETWORK CAMERA	EA	4			327.00	1308.00
002	DS2CD2542FWDIS/2.8 COMPACT DOME 1080P H264 2.8mm	EA	3			198.00	594.00
003	DS2CD2142FWDIS/2.8 OUTDOOR DOME 1080P H264 2.8mm LENS	EA	1			173.00	173.00
004	DS2CD2142FWDIS/4MM OUTDOOR DOME 1080P H264 4.0MM LENS	EA	1			173.00	173.00
005	DS2CD2142FWDIS/6MM OUTDOOR DOME 1080P H264 6.0mm LENS	EA	1			173.00	173.00
006	EMAIL INVOICE/TRACKING TO: accounting@fentonmail.com		1			0.00	0.00

TERMS AND CONDITIONS: All sales are final. No unauthorized returns will be accepted
All returns subject to minimum 25% Restocking fee
All shortages/damages must be reported in 10 days

Customer Signature/Date:_____

Box Count _____ Weight _____

Thank you very much for your business

Taxable SubTotal:	2421.00
Calif. Sales Tax:	0.00
Sub Total :	2421.00
Shipping :	0.00
Total :	2421.00

242

HIKVISION

DS-2CD2542FWD-IS Series
4 MP WDR Mini Dome Network Camera

Key Features

- 4 MP High Resolution
- Full HD1080p
- Dual Video Streams
- 2.8 mm, 4 mm, 6 mm Fixed Lens Options
- 120 dB Wide Dynamic Range
- 3D Digital Noise Reduction
- 3-Axis Adjustment
- 12 VDC and PoE
- Supports H.264+
- Up to 10 Meters IR Range
- IP66 Weatherproof Protection
- IK08 Vandal Resistant
- Built-In Microphone, Audio Output, Alarm I/O
- Wireless Option (-IWS)

Accessories

Wall Mount
PC120

Wall Mount + Junction Box
WML + PC120

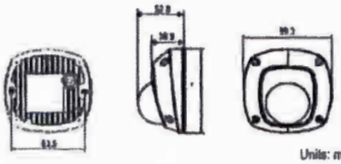
Pendant Mount
CPM + PC120

Sun/Rain Shade
SRSM

Vertical Pole Mount
PM

Corner Mount
CM

Dimensions



Order Model

DS-2CD2542FWD-IS
DS-2CD2542FWD-IWS, WiFi

DS-2CD2542FWD-IS Series	
Camera	
Image Sensor	1/3" progressive scan CMOS
Minimum Illumination	0.01 lux @ (f/1.2, AGC on), 0 lux with IR 0.028 lux @ (f/2.0, AGC on), 0 lux with IR
Shutter Speed	1/3 s to 1/10,000 s
Lens	2.8 mm, 4 mm, 6 mm @ f/2.0
Lens Mount	M12
Day/Night	IR cut filter with auto switch
DNR	3D DNR
Wide Dynamic Range	120 dB
Angle of Adjustment	Pan: -30° to 30°, tilt: 0 to 75°, rotation: 0 to 360°
Compression Standard	
Video Compression	H.264/MJPEG/H.264+
H.264 Type	Main profile
Video Bit Rate	32 Kbps to 16 Mbps
Dual Streams	Supported
Audio Compression	G.711/G.722.1/G.726/MP2L2
Audio Bit Rate	64 Kbps (G.711)/16 Kbps (G.722.1)/16 Kbps (G.726)/32 to 128 Kbps (MP2L2)
Image	
Maximum Resolution	2688 × 1520
Frame Rate	20 fps (2688 × 1520), 30 fps (1920 × 1080), 30 fps (1280 × 720)
Image Setting	Rotate mode, saturation, brightness, contrast, sharpness adjustable by client software or Web browser
BLC	Supported, zone configurable
ROI Codec	Supported
Network	
Network Storage	NAS (supports NFS,SMB/CIFS), ANR
Alarm Trigger	Motion detection, tampering alarm, network disconnect, IP address conflict, storage exception
Protocols	TCP/IP, UDP, ICMP, HTTP, HTTPS, FTP, DHCP, DNS, DDNS, RTP, RTSP, RTCP, PPPoE, NTP, UPnP, SMTP, SNMP, IGMP, 802.1X, QoS, IPv6, Bonjour
General	One-key reset, flash-prevention, dual stream, heartbeat, mirror, password protection, privacy mask, watermark, IP address filtering, anonymous access
Standard	ONVIF (PROFILE S, PROFILE G), PSIA, CGI, ISAPI
Interface	
Communication Interface	1 R-J45 10M/100M Ethernet port
On-Board Storage	Built-in microSD/SDHC/SDXC slot, up to 128 GB
Alarm Interface	1x alarm I/O
Audio Interface	Built-in microphone and 1x audio output
Reset	Yes
WI-FI (-W models only)	
Wireless Standards	IEEE802.11b, 802.11g, 802.11n
Frequency Range	2.4 GHz to 2.4835 GHz
Channel Bandwidth	20/40 MHz support
Protocols	802.11b: CCK, QPSK, BPSK, 802.11g/n: OFDM
Security	64/128-bit WEP, WPA/WPA2, WPA-PSK/WPA2-PSK, WPS
Transmit Output Power	11b: 17 ±1.5 dBm @ 11 Mbps 11g: 14±1.5 dBm @ 54 Mbps 11n: 12.5±1.5 dBm
Reception Sensitivity	11b: -90 dBm @ 11 Mbps (typical) 11g: -75 dBm @ 54 Mpbs (typical) 11n: -74 dBm (typical)
Transfer Rates	11b: 11 Mbps, 11g: 54 Mbps, 11n: up to 150 Mbps
Wireless Range	50 meters *The performance varies based on actual environment.
General	
Operating Conditions	-30° C to 60° C (-22° F to 140° F), humidity 95% or less (non-
Power Supply	12 VDC ±10%, PoE (802.3af)
Power Consumption	Maximum 5 W, maximum 9 W with pan and tilt
IR Range	Approximately 10 meters
Ingress Protection	IP66
Impact Protection	IEC60068-275Eh, 20J; EN50102, up to IK08
Dimensions	99.3 mm × 96.7 mm × 52.8 mm (3.91" x 3.81" x 2.08")
Weight	600 g (1.32 lbs)

Hikvision USA Inc., 908 Canada Court, City of Industry, CA 91748, USA • Hikvision Canada, 4485 Dobrin, St-Laurent, Quebec, Canada, H4R 2L8
Tel: +1-909-895-0400 • Toll Free in USA: +1-866-200-6690 • E-Mail: sales.usa@hikvision.com • www.hikvision.com
© 2015 Hikvision USA Inc. • All Rights Reserved • Specifications subject to change without notice.

245

010816US

HIKVISION

DS-2DE3304W-DE

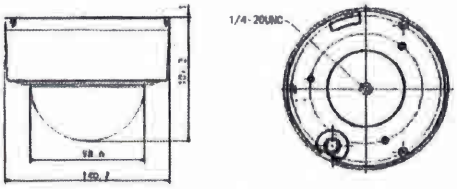
3 MP Network Mini PTZ Repositionable Dome Camera

Key Features

- Easy Installation and Setup
- Remote Positioning of Pan/Tilt/Zoom
- 1/2.8" Progressive Scan CMOS 2048 x 1536
- 4x Optical Zoom, 16x Digital Zoom
- 0° to 350° Pan, 5° to 90° Tilt, 10°/Sec.
- DWDR
- IP66/IK10 Rated
- PoE (802.3af)
- Supports RS-485
- Supports Plug & Play
- Adapter Plate for Surface Mounting

DS-2DE3304W-DE	
Camera Module	
Image Sensor	1/2.8" progressive scan CMOS
Minimum Illumination	*f*/1.6, AGC on, color: 0.05 lux, B/W: 0.01 lux
Maximum Image Resolution	2048 × 1536
Focal Length	2.8 mm to 12 mm, 4x
Digital Zoom	16x
Angle of View	105° to 33.5° (wide to tele)
Aperture Range	*f*/1.6 to *f*/2.7
Focus Mode	Auto/semiautomatic/manual
DWDR	Supported
S/N Ratio	≥52 dB
Shutter Speed	1/1 to 1/10,000 s
AGC	Auto/manual
White Balance	Auto/manual/ATW/indoor/outdoor/daylight lamp/sodium lamp
Day/Night	IR cut filter
Privacy Mask	8 privacy masks programmable
Enhancement	3D DNR, HLC/BLC
Pan and Tilt	
Range	Pan: 0° to 350°; tilt: 5° to 90°
Speed	Pan: 0.1° to 60°/sec (manual), 30°/s (preset) Tilt: 0.1° to 50°/sec (manual), 25°/s (preset)
Number of Presets	300
Patrols	8 patrols, up to 32 presets per patrol
Park Actions	Preset/patrol
Scheduled Tasks	Preset/reboot/patrol/self test/aux output
Features	
Detection	Intrusion detection, line crossing detection, audio exception detection, motion detection
ROI Encoding	Supports 4 areas with adjustable levels
Alarm	
Alarm I/O	1/1
Alarm Triggers	Intrusion detection, line crossing detection, motion detection, audio exception detection, dynamic analysis, tampering alarm, network disconnect, IP address conflict, storage exception
Alarm Actions	Preset, recording, relay output, upload center, upload FTP, e-mail linkage
Input/ Output	
Audio Input	1 audio input (mic/line in), 2 to 2.4V[p-p]; output impedance: 1K Ω, ±10%
Audio Output	1 output, line level, impedance: 600 Ω
Network	
Ethernet	10Base-T/100Base-TX, RJ-45 connector
Main Stream	30 fps @ 2048 × 1536, 1920 × 1080, 1280 x 960, 1280 x 720
Sub Stream	30 fps @ 704 × 480, 640 × 480, 320 × 240
Image Compression	H.264/MJPEG
Audio Compression	G.711ulaw/G.711alaw/G.726/MP2L2/G.722/PCM
Protocols	IPv4/IPv6, HTTP, HTTPS, 802.1X, QoS, FTP, SMTP, UPnP, SNMP, DNS, DDNS, NTP, RTSP, RTP, TCP, UDP,IGMP, ICMP, DHCP, PPPoE
Simultaneous Live View	Up to 20 users
MicroSD Memory Card	Supports up to 128 GB microSD/SDHC/SDXC card and edge recording
User/Host Level	Up to 32 users,3 levels: administrator, operator, and user
Security Measures	User authentication (ID and PW); host authentication (MAC address); IP address filtering
System Integration	
Application Programming	Open-ended API, supports ONVIF, PSIA, CGI, and Genetec
Web Browser	IE 7+, Chrome 18+, Firefox 5.0+, Safari 5.02+
Power	POE, 12 VDC, maximum 8 W
Working Temperature	-30° C to 65° C (-22° F to 149° F)
Humidity	90% or less
Protection Level	IP66, TVS 4,000 V lightning, surge, and voltage transient protection
Certification	FCC, CE, UL, RoHS, IEC/EN 61000, IEC/EN 55022, IEC/EN 55024, IEC/EN60950-1
Dimensions	Φ140.7 mm × 107.2 mm (5.54" x 4.22")
Weight (approx.)	950 g (33.5 oz)

Dimensions



Order Models

DS-2DE3304W-DE

Accessories

Pendant Cap PC140PT | Wall Mount WML or WMS | In-Ceiling Mount RCM-4 | Conduit Base CB140PT | Vertical Pole Mount PM | Corner Mount CM | Network Keyboard DS-1100KI | USB Joystick DS-1005KI

Hikvision USA Inc., 908 Canada Court, City of Industry, CA 91748, USA • Hikvision Canada, 4485 Dobrin, St-Laurent, Quebec, Canada, H4R 2L8
Tel: +1-909-895-0400 • Toll Free in USA: +1-866-200-6690 • E-Mail: sales.usa@hikvision.com • www.hikvision.com
© 2016 Hikvision USA Inc. • All Rights Reserved • Specifications subject to change without notice.

243

070616NA

HIKVISION

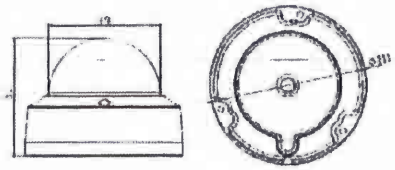
DS-2CD2142FWD-IS

4 MP WDR Fixed Dome Network Camera

- 4 Megapixel High Resolution
- Full HD1080p Video
- Dual Video Streams
- 2.8 mm, 4 mm, 6 mm Fixed Lens Options
- 120 dB Wide Dynamic Range
- 3D Digital Noise Reduction
- Smart Features
- PoE (802.3af)
- IR Range 30 Meters (~100 Feet)
- IP66 and IK08 Protection
- Audio and Alarm I/O
- Edge Storage, MicroSD Slot, 128 GB

DS-2CD2142FWD-IS	
Camera	
Image Sensor	1/3" progressive scan CMOS
Minimum Illumination	Color: 0.028 lux @ (f/2.0, AGC on); B/W: 0 lux with IR
Shutter Speed	1/3 s to 1/10,000 s
Lens	2.8 mm, 4 mm, 6 mm options
Angle of View	106° (2.8 mm), 83° (4 mm), 56° (6 mm)
Lens Mount	M12
Day/Night	IR cut filter with auto switch
Digital Noise Reduction	3D Digital Noise Reduction
Wide Dynamic Range	120 dB
Pan/Tilt/Rotation	Pan: 0° to 355°; tilt: 0° to 75°; rotation: 0° to 355°
Compression Standards	
Video Compression	H.264/MJPEG
H.264 Type	Main Profile
Video Bit Rate	32 Kbps to 16 Mbps
Dual Streams	Yes
Audio	G.711/G.722.1/G.726/MP2L2, 64 Kbps (G.711)/16 Kbps (G.722.1)/ 16 Kbps (G.726)/32 to 128 Kbps (MP2L2)
Image	
Maximum Resolution	2688 × 1520
Frame Rate	20 fps (2688 × 1520), 30 fps (1920 × 1080), 30 fps (1280 × 720)
Image Settings	Compression, color, saturation, brightness, contrast, sharpness, rotate mode, privacy mask
Backlight Compensation	Yes, zone configured
Region of Interest (ROI)	Yes
Analytics	
Smart Features	Line crossing detection, intrusion detection
Network	
Network Storage	NAS (supports NFS,SMB/CIFS), ANR
Alarm Triggers	Motion detection, line crossing detection, intrusion detection, tamper alarm, network disconnect, IP address conflict, storage exception
Protocols	TCP/IP, UDP, ICMP, HTTP, HTTPS, FTP, DHCP, DNS, DDNS, RTP, RTSP, RTCP, PPPoE, NTP, UPnP, SMTP, SNMP, IGMP, 802.1X, QoS, IPv6, Bonjour
Security	Three level user authentication, password authorization, HTTPS and SSH certificate, IEEE802.1X, basic and digest authentication, watermark, IP address filtering, log-in lockout
Standards	ONVIF (PROFILE S, PROFILE G), PSIA, CGI, ISAPI
Interface	
Communication	1 RJ-45 10M/100M Ethernet port
On-Board Storage	Built-in microSD/SDHC/SDXC slot, up to 128 GB
Alarm	1x alarm I/O
Audio	1x audio I/O
General	
Operating Conditions	-30° C to 60° C (-22° F to 140° F), humidity 95% or less (non-condensing)
Power	12 VDC ±10%, PoE (802.3af)
Power Consumption	Maximum 5 W
IR Range	Approximately 30 meters (~100 feet)
Ingress Protection	IP66
Impact Protection	IEC60068-275Eh, 20J, EN50102, up to IK10
Dimensions	Φ111 mm × 82 mm (4.4" × 3.2")
Weight	500 g (1.1 lbs)

Dimensions



Order Model

DS-2CD2142FWD-IS

Accessories

AB110
Angled Base

PC110 + WMS
Pendant Cap + Wall Mount/Junction Box

CB110
Conduit Base

SRSM
Rain Shade

WM110
Wall Mount

244

Hikvision USA Inc., 908 Canada Court, City of Industry, CA 91748, USA • Hikvision Canada, 4485 Dobrin, St-Laurent, Quebec, Canada, H4R 2L8
Tel: +1-909-895-0400 • Toll Free in USA: +1-866-200-6690 • E-Mail: sales.usa@hikvision.com • www.hikvision.com
© 2015 Hikvision USA Inc. • All Rights Reserved • Specifications subject to change without notice.

010816US

FILED
WILLIAMSON COUNTY
CHANCERY COURT
2019 AUG 29 AM 9:19
FILED FOR ENTRY_____

Williamson County Sheriff's Office
305 Public Square
Franklin, Tennessee 37064
615-790-5492

TO: _____
OR RESIDENT

Legal process has been issued and forwarded to the Sheriff's Office for service. This requires that Civil Process be served to you.

THIS IS NOT AN ARREST WARRANT

Please contact Deputy [redacted] at **615-**[redacted] to make arrangements to pick up or have your paper delivered.

Thank you

Office Hours: 7:00 am–5:00 pm Monday-Friday

CHANCELLOR MICHAEL W. BINKLEY
Williamson County Chancery Court

EXHIBIT - I

RE: Fenton v Fenton Case# 48419B

246

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

Please send all correspondences
Via U.S. Mail, standard post.

October 9, 2017

Via U.S. Mail and facsimile to (615) 790-8861

Lisa M. Carson
BUERGER, MOSELEY & CARSON, PLC I.
Williamson County Attorneys
306 Public Square
Franklin, TN 37064
P: (615) 794-8850
F: (615) 790-8861

Via U.S. Mail and facsimile to (615) 790-5580

Sheriff Jeff Long
Williamson County Sheriff's Office
408 Century Court
Franklin, TN 37064
P: (615) 790-5560
F: (615) 790-5580

RE: WCSO Officers Trespassing, Harassing, Littering at Fawn Fenton's Residence

Dear Sheriff Long and Ms. Carson:

With Sheriff Long's letter dated June 7, 2017 and Ms. Carson's letter dated July 17, 2017, you both have made it clear to me that you will acknowledge none of my concerns, answer none of my questions, and address none of my complaints about this issue, regardless of their validity. I was never asking you for "legal advice," as Ms. Carson's letter alleges, nor were my questions "hypothetical" in nature. I was asking direct yes/no questions about WCSO policy, and I was never "engaging in debate" with you. The condescension and "finality" in the tone of Ms. Carson's letter communicate to me that you flatly refuse to assist me in this matter at all.

247

As a result of the events I described in my letter dated May 30, 2017, and compounded by your non-responsive responses to my inquiries, I have experienced considerable emotional distress because you have given me no reasonable assurance that the WCSO will respect my "right of exclusion" and expectation of privacy on my property now or in the future. I have done my best to communicate to you with honesty, integrity, and accuracy about events which shocked and frightened me, while trying to give the WCSO the "benefit of the doubt", asking you for clarification rather than jumping to conclusions. But so far, my letters have yielded absolutely no progress towards resolution, and no relevant or helpful information from you whatsoever. However, I do not wish to "continue to engage in debate" with you, and I do not wish to bring full legal action against you at this time; therefore, this letter is my attempt to provide myself some remedy, to restore my peace and enjoyment of my home and property that your officers took away from me by ignoring my "No Trespassing" signage on May 15th, and again on May 24th, compounded by their outrageously disrespectful behavior. This letter is to serve as a formal Trespass Notice:

> To: The Williamson County Sheriff's Office
>
> You are hereby notified that, effective immediately, unless you have an official warrant or you are responding to a specific emergency, you are expressly forbidden from entering on or into the property occupied by me in Williamson County, at address 1986 Sunny Side Drive, Brentwood, Tennessee, 37027. This "No Trespass" notice will remain effective continuously into the future, for as long as I reside at this property, until expressly rescinded by me in writing. Failure to comply with this notice may result in legal action against your organization.

In case you harbor any doubts about the behavior of the two WCSO officers as I described in my letter dated May 30, 2017, I am including a few photos of my original signage, demonstrating that my signage was unavoidably clear and noticeable by anyone approaching my property. I further have photos of postal and parcel deliveries left curbside, at the base of my signs, balancing on top of my brick mailbox, and even left in the ditch, as my expectation to privacy was clearly marked, broadly understood, and reasonable to all except for the WCSO. I am also including some photos which were taken by my home security system, on both May 15th and May 24th, providing you with proof of your officers' illegal actions upon my property, in light of the obvious and clear signage posted. These are only a few snapshots of the video footage that I have, but should be enough to substantiate that my complaints to you are accurate and legitimate.

Recently I have posted new "No Trespassing" signage at the driveway entering my property, a copy of which is attached to this letter for your information. I believe this signage removes any possible ambiguity or misinterpretations regarding my expectation of privacy.

In hopes that you will better understand my intentions, I am also including with this letter a copy of the dissenting opinion written by Justice Sharon G. Lee of the Tennessee Supreme Court regarding *State of Tennessee vs. James Robert Christensen Jr.*, No. W2014-00931-SC-R11-CD. The opinions expressed by Justice Lee in this document generally mirror my own sentiments, and I largely agree with her interpretations of private property rights and conclusions. If you haven't already, I would encourage you to read Justice Lee's opinion and consider its merits.

Lastly, I am giving you notice that I have no influence over, and am in no way responsible for Jeff Fenton's actions. You cannot assume that I know about his actions or his whereabouts, and you certainly cannot assume that I support, agree with, or assist him. He and I are going through a difficult time in our relationship, and you need to respect us as separate persons.

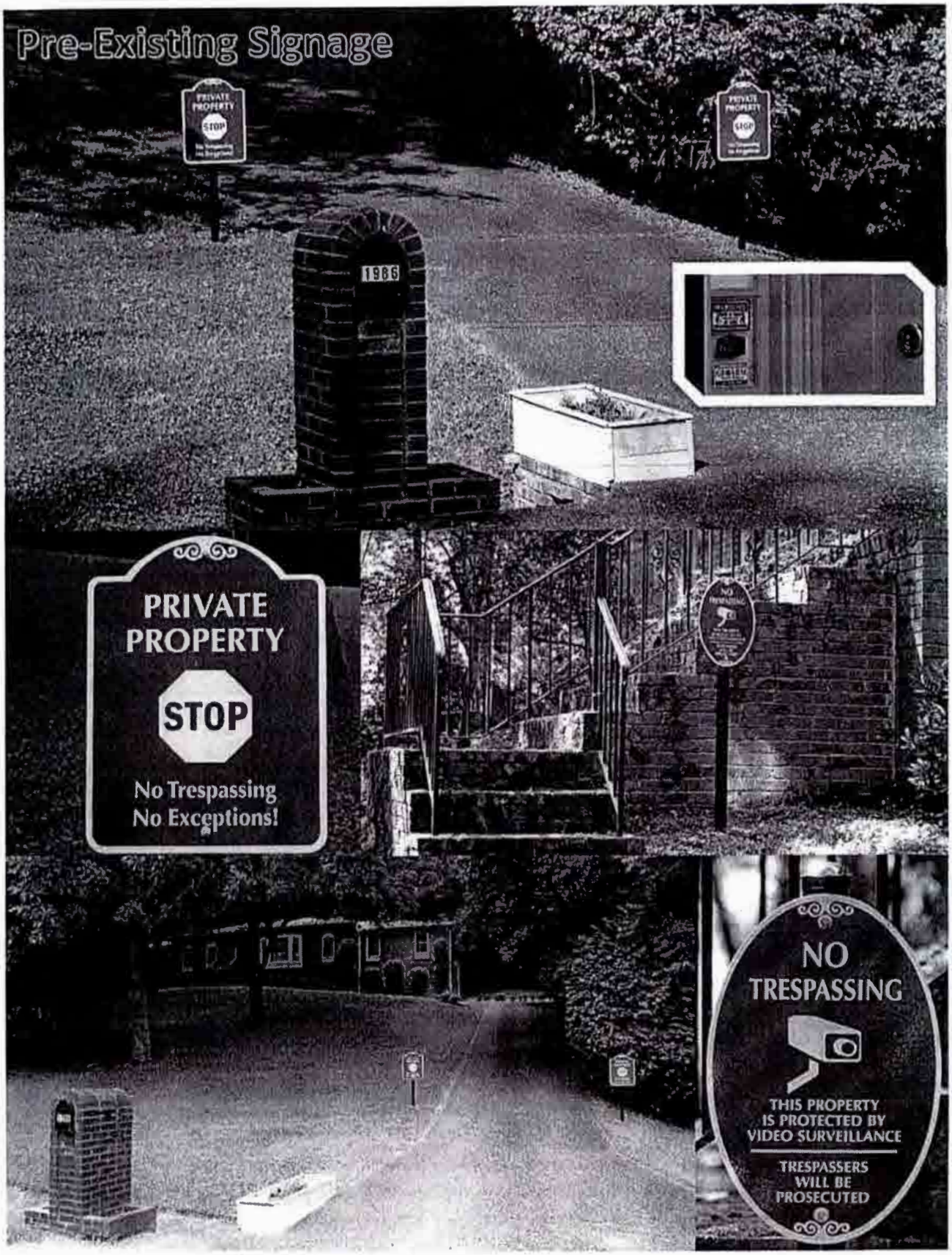
I sincerely hope that there will be no need for further communication on this matter, and I wish you the best in your continued service to Williamson County.

Sincerely,

Fawn Fenton

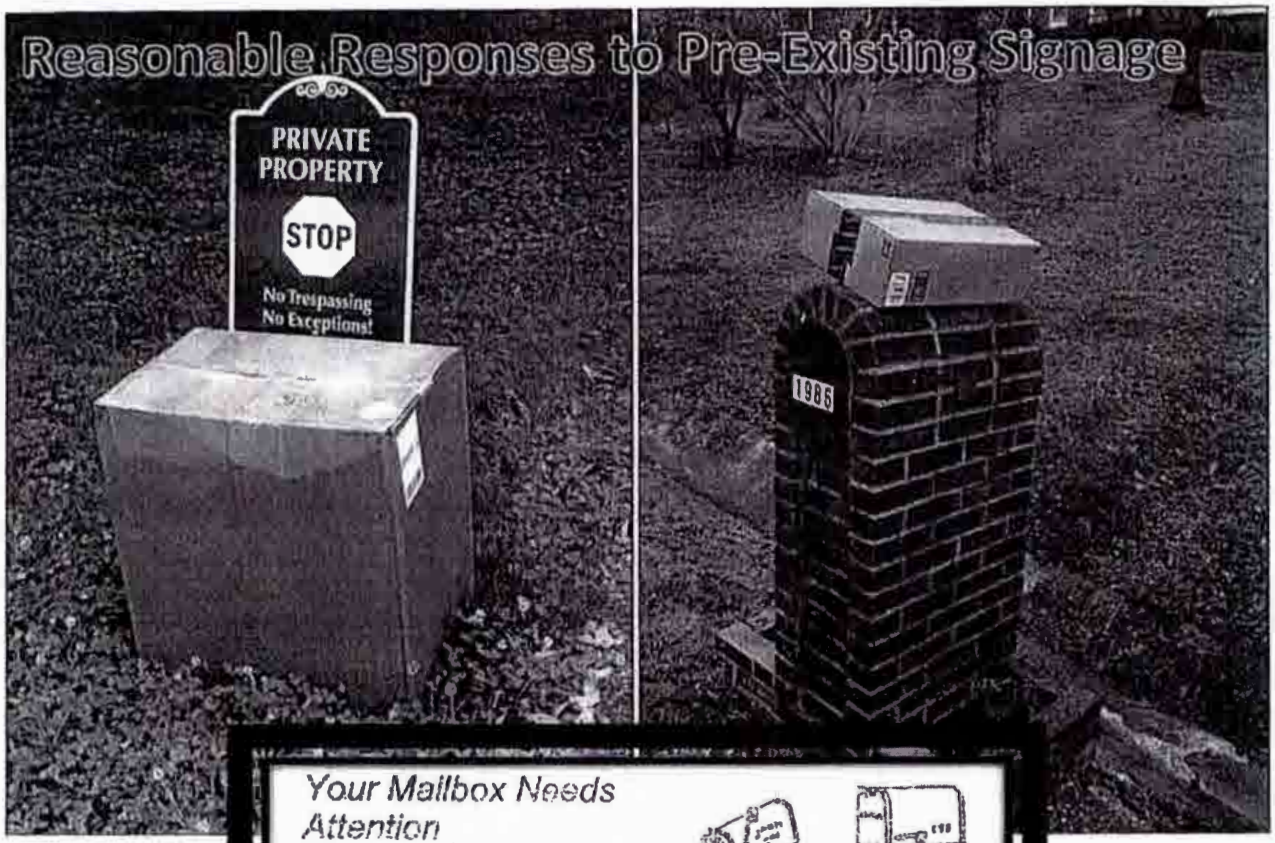
Homeowner and resident of 1986 Sunny Side Drive.

(Attachments sent only via U.S. Mail)


Pre-Existing Signage
PRIVATE PROPERTY
STOP
No Trespassing
No Exceptions!
1986
NO TRESPASSING
THIS PROPERTY IS PROTECTED BY VIDEO SURVEILLANCE
TRESPASSERS WILL BE PROSECUTED

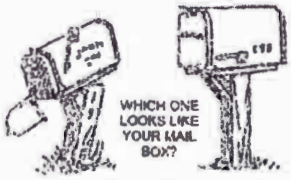
250

Reasonable Responses to Pre-Existing Signage



Your Mailbox Needs Attention

1-13-16
(Date)

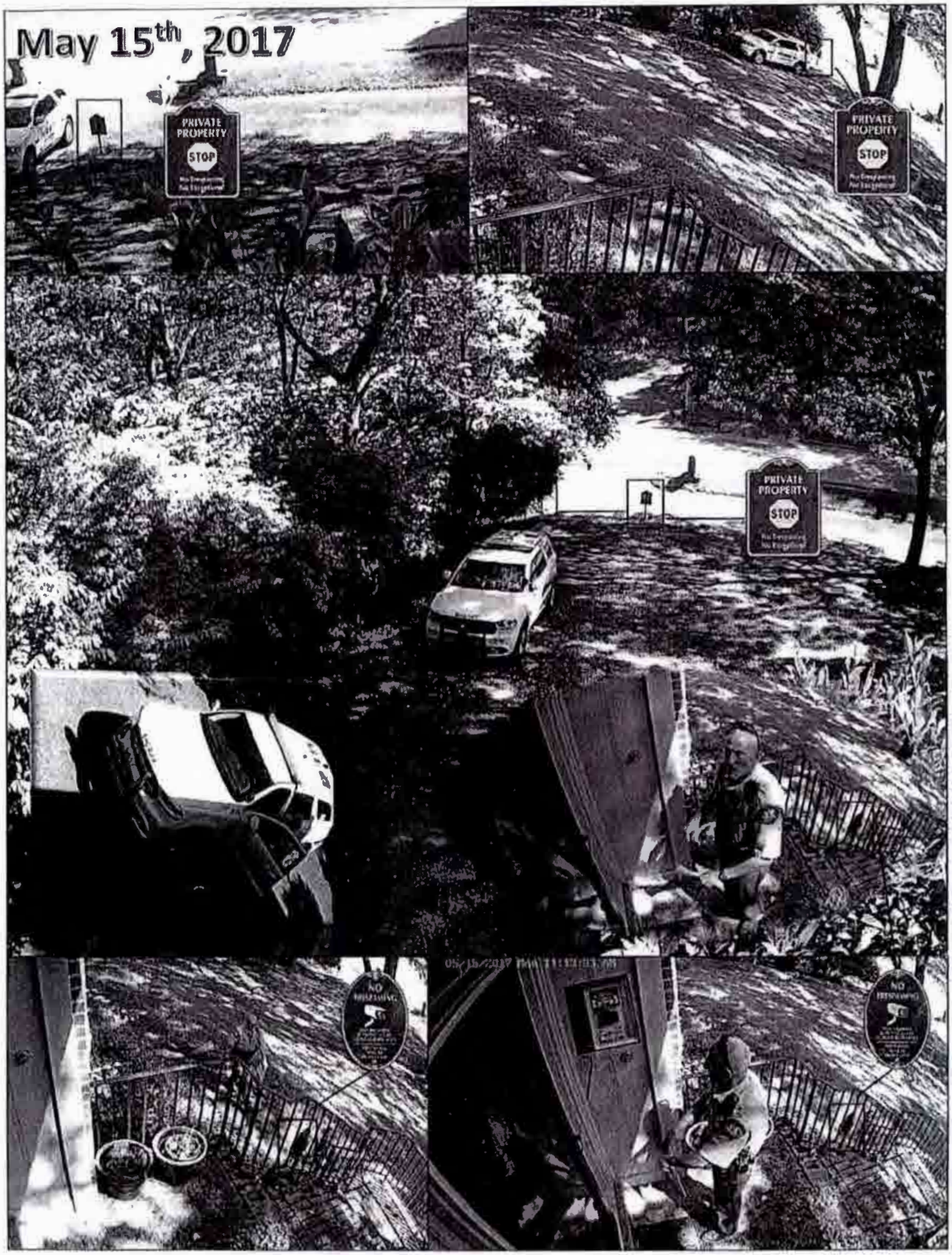


Postal regulations require customers to provide and erect at their own expense rural mail boxes which meet official standards. A recent inspection disclosed the following faults.

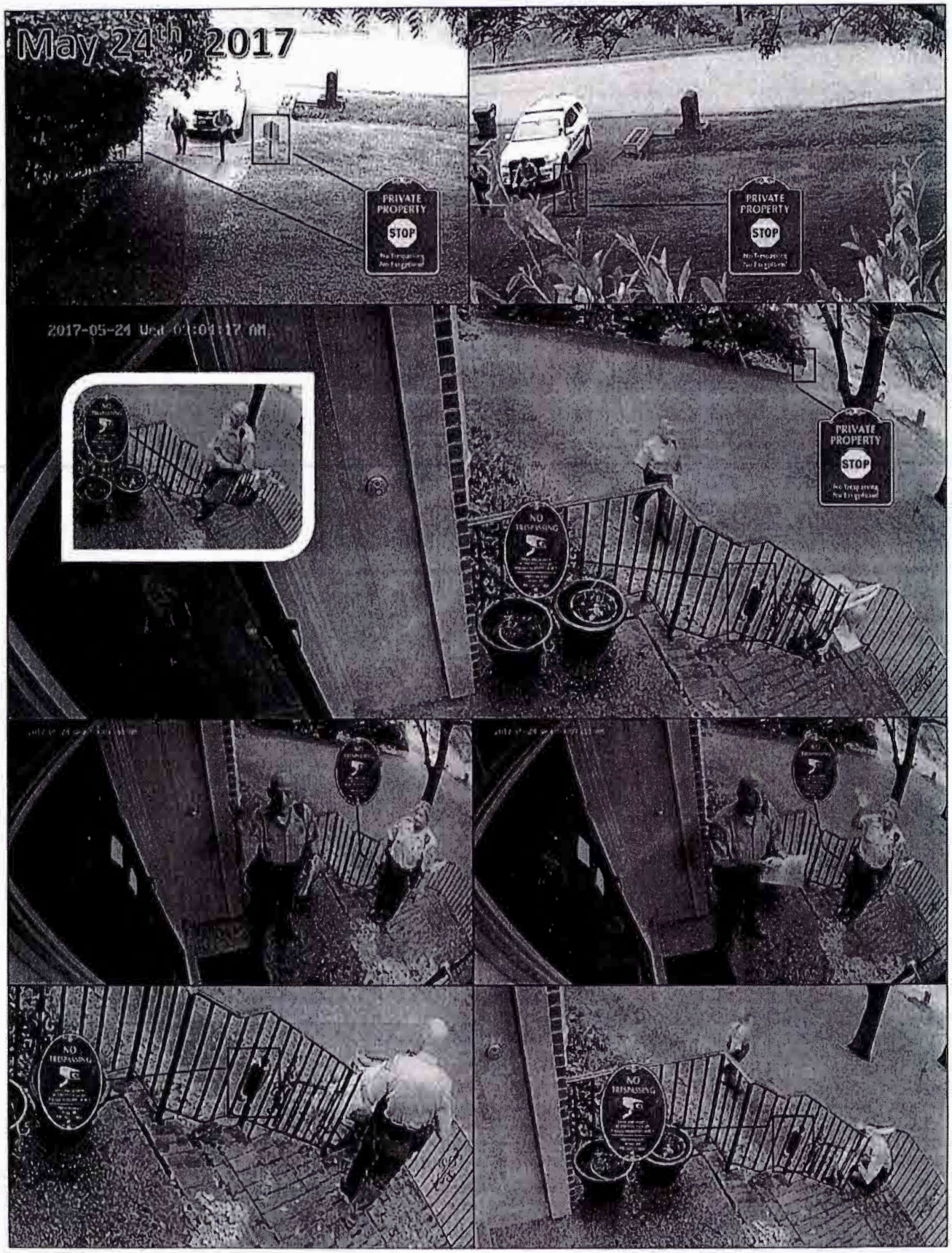
	1. Your box is not an approved box		10. Tee Signal Flag needs attention
	2. The door needs attention		11. Your box is too near the road
	3. Box must be located so carrier can serve it without leaving vehicle		12. Your box is too far from the road
	4. Your box is not waterproof		13. Your box should face the road
	5. Your box should be raised _____ inches		14. Your box should be securely anchored to its support
	6. Your box should be lowered _____ inches		15. Your box should be made level, and the post firmly planted
	7. Your box must be located on the right-hand side of the road in the carrier's direction of travel		16. A new post for your box should be provided
	8. The approach to your box should be filled and properly graded & kept weed-free at all times		17. The rural box number must be painted in numerals not less than one inch high on the side of the box visible to the carrier as they approach it or on the box door if the boxes are grouped
	9. The approach to your box should be kept clear of snow, vehicles, and other obstacles		18. Your box should be painted to prevent rusting
			19. Your house number must be clearly displayed _____ on your house or _____ on your box

20. Other Faults

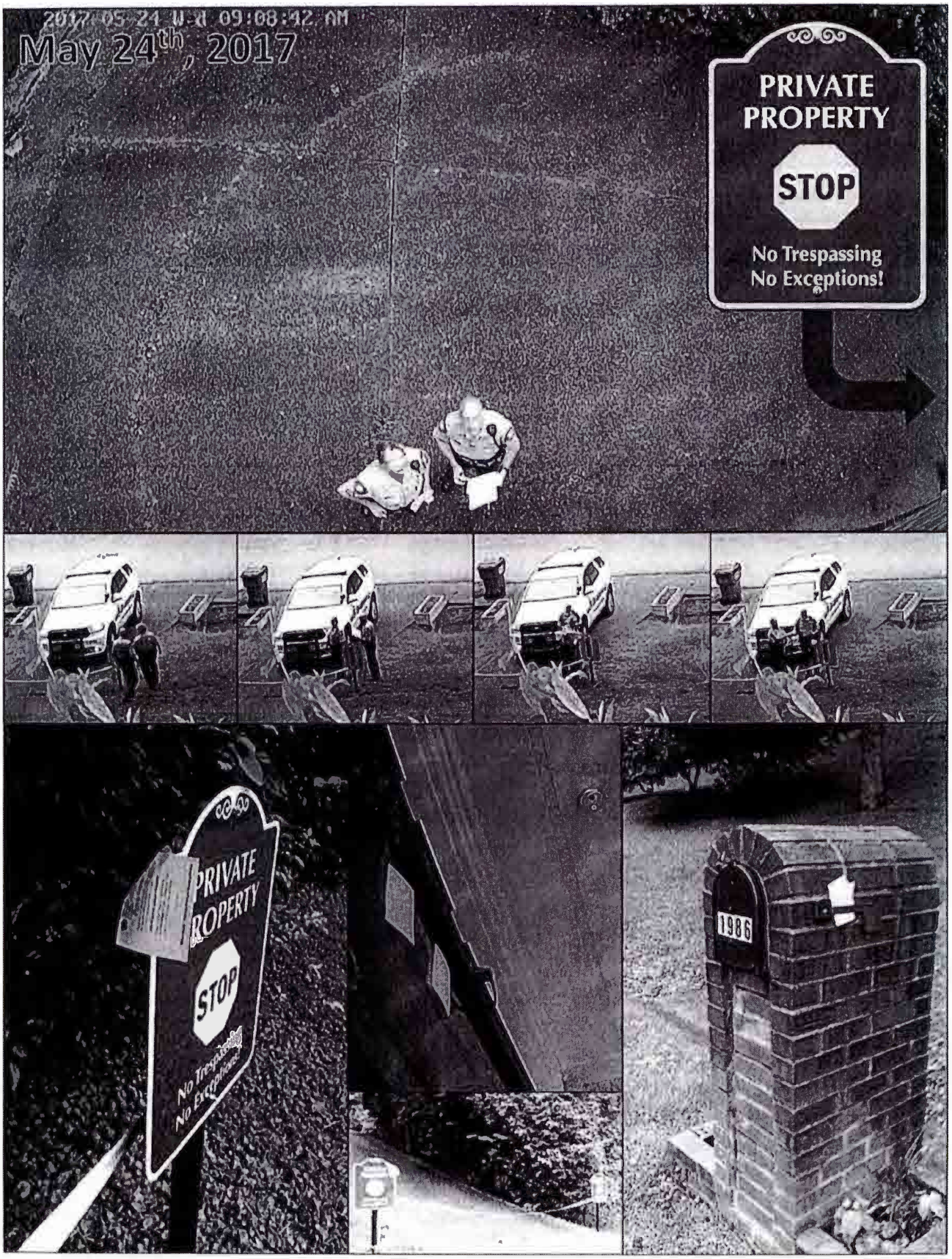
I saw your no trespassing sign! Do you still want packages delivered to your house.
Thanks, Your mail carrier


May 15th, 2017
PRIVATE PROPERTY
STOP
PRIVATE PROPERTY
STOP
PRIVATE PROPERTY
STOP

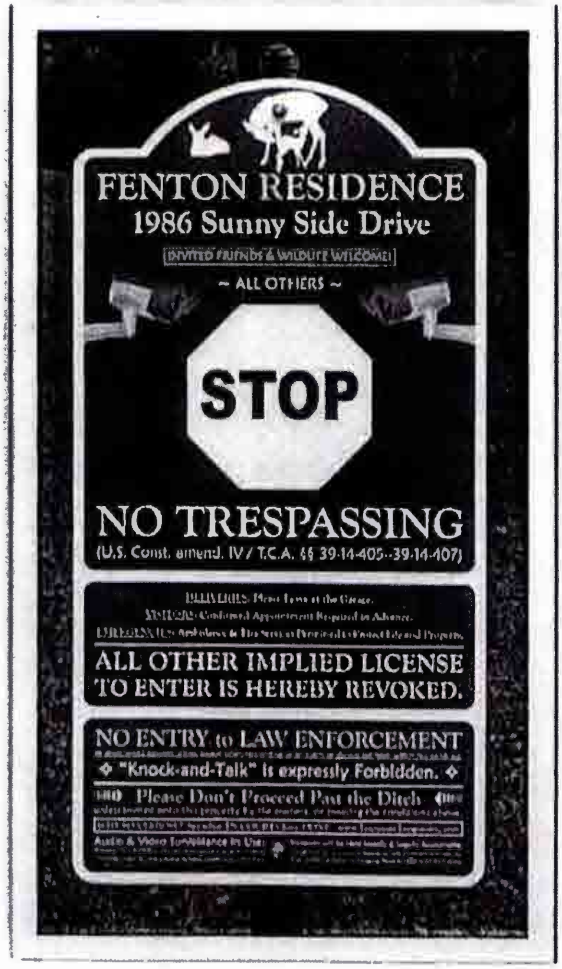
252

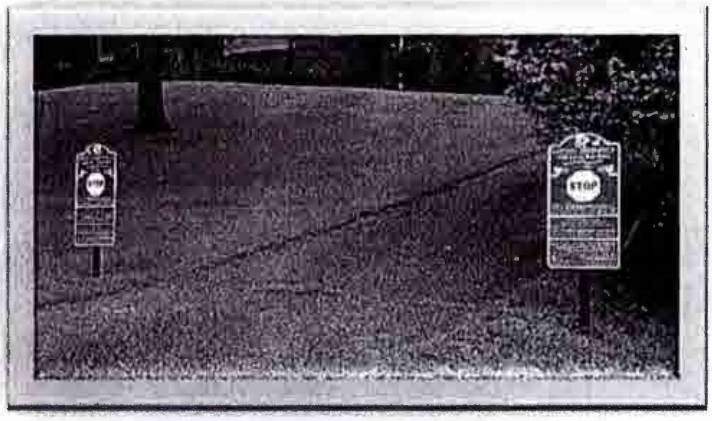

May 24th, 2017
PRIVATE PROPERTY
STOP
2017-05-24 Wed 01:04:17 AM
NO TRESPASSING

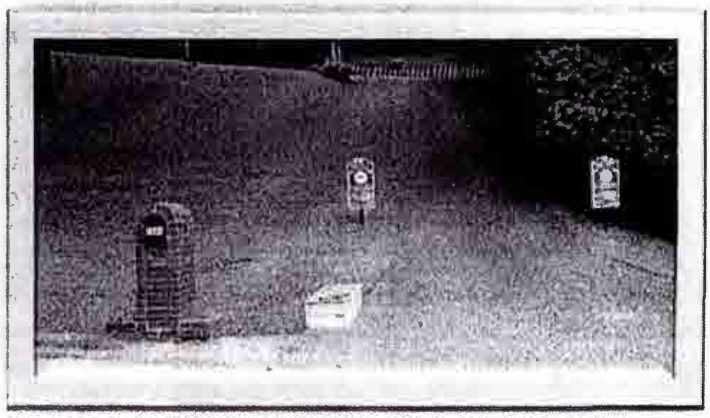
253


2017 05 24 Wed 09:08:42 AM
May 24th, 2017
PRIVATE PROPERTY
STOP
No Trespassing
No Exceptions!
PRIVATE PROPERTY
STOP
1986

NEW Signage Installed


FENTON RESIDENCE
1986 Sunny Side Drive
~ ALL OTHERS ~
STOP
NO TRESPASSING
(U.S. Const. amend. IV / T.C.A. §§ 39-14-405--39-14-407)
ALL OTHER IMPLIED LICENSE
TO ENTER IS HEREBY REVOKED.
NO ENTRY to LAW ENFORCEMENT
"Knock-and-Talk" is expressly Forbidden.
Please Don't Proceed Past the Ditch


STOP



FENTON RESIDENCE

1986 Sunny Side Drive

INVITED FRIENDS & WILDLIFE WELCOME!

~ ALL OTHERS ~

STOP

NO TRESPASSING

(U.S. Const. amend. IV / T.C.A. §§ 39-14-405--39-14-407)

DELIVERIES: Please Leave at the Garage.

VISITORS: Confirmed Appointment Required in Advance.

EMERGENCIES: Ambulance & Fire Services Permitted to Protect Life and Property.

ALL OTHER IMPLIED LICENSE TO ENTER IS HEREBY REVOKED.

NO ENTRY to LAW ENFORCEMENT

or government representatives, except when responding to an alarm or distress call from within this residence.

✧ "Knock-and-Talk" is expressly Forbidden. ✧

Please Don't Proceed Past the Ditch

unless invited onto this property by the owners, or meeting the conditions above.

WHY SO VERBOSE? See what TN COURTS have DONE: www.TennesseeTrespassing.com

Audio & Video Surveillance in Use:

BY Entering YOU AUTHORIZE the USE of ANY Media Captured of you, for ANY PURPOSE. YOU AGREE to Indemnify and Hold Harmless the Fentons (property owners) of ALL Claims.

Violators will be Held Socially & Legally Accountable.

through ANY Media Channel or Publication, both Online and Otherwise, and IF you do NOT AGREE to the Foregoing, Please do NOT ENTER this Property.

256

TRANSMISSION VERIFICATION REPORT

TIME : 10/09/2017 09:36
NAME : UPS STORE 3355
FAX : 6153770120
TEL : 6153778100
SER.# : BROE8J808035

DATE,TIME	10/09 09:35
FAX NO./NAME	6157908861
DURATION	00:00:51
PAGE(S)	03
RESULT	OK
MODE	STANDARD ECM

257

TRANSMISSION VERIFICATION REPORT

TIME : 10/09/2017 09:34
NAME : UPS STORE 3355
FAX : 6153770120
TEL : 6153778100
SER.# : BROE8J808035

DATE,TIME	10/09 09:33
FAX NO./NAME	6157905580
DURATION	00:00:49
PAGE(S)	03
RESULT	OK
MODE	STANDARD ECM

258

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WILLIAMSON COUNTY SHERIFF
ATTN: SHERIFF JEFF LONG
408 CENTURY COURT
FRANKLIN, TN 37064

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X J Payne ☐ Agent ☐ Addressee

B. Received by (Printed Name) J. Payne
C. Date of Delivery 10/18

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7017 0190 0000 6516 2942

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

UNITED STATES POSTAL SERVICE
NASHVILLE TN 370
18 OCT '17
PM 2 1

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

FAWN FENTON
1986 SUNNY SIDE DR.
BRENTWOOD, TN 37027

259

English Customer Service Informed Delivery Register / Sign In

USPS.COM

Quick Tools | Mail & Ship | Track & Manage | Postal Store | Business | International | Help

ALERT. GET UPDATES ON MAIL SERVICE IN CALIFORNIA, THE U.S. VIRGIN ISLANDS AND PUERTO RICO. READ MORE >

USPS Tracking® Results

Tracking FAQs

Track Another Package +

Remove ×

Tracking Number: 70170190000065162942

Delivered

Expected Delivery on: Wednesday, October 18, 2017 by 8:00pm

Product & Tracking Information

See Available Actions

Postal Product:
First-Class Mail®

Features:
Certified Mail™
Return Receipt

DATE & TIME	STATUS OF ITEM	LOCATION
October 18, 2017, 10:51 am	**Delivered, Front Desk/Reception**	**FRANKLIN, TN 37064**
Your item was delivered to the front desk or reception area at 10:51 am on October 18, 2017 in FRANKLIN, TN 37064.		
October 18, 2017, 8:40 am	Arrived at Unit	FRANKLIN, TN 37064
October 18, 2017, 5:18 am	Arrived at USPS Facility	FRANKLIN, TN 37064
October 18, 2017, 4:22 am	Departed USPS Regional Facility	NASHVILLE TN DISTRIBUTION CENTER
October 18, 2017, 2:15 am	Arrived at USPS Regional Facility	NASHVILLE TN DISTRIBUTION CENTER
October 18, 2017, 2:09 am	Departed USPS Regional Facility	NASHVILLE TN DISTRIBUTION CENTER ANNEX
October 18, 2017, 12:48 am	Arrived at USPS Regional Facility	NASHVILLE TN DISTRIBUTION CENTER ANNEX
October 17, 2017, 10:38 pm	Arrived at USPS Regional Facility	NASHVILLE TN DISTRIBUTION CENTER ANNEX
October 17, 2017, 4:37 pm	USPS in possession of item	BRENTWOOD, TN 37027

See Less

260

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

7017 0190 0000 6516 2959

Certified Mail Fee $3.35
Extra Services & Fees (check box, add fee as appropriate)
☒ Return Receipt (hardcopy) $
☒ Return Receipt (electronic) $
☐ Certified Mail Restricted Delivery $
☐ Adult Signature Required $
☐ Adult Signature Restricted Delivery $
Postage $3.32
Total Postage and Fees $7.42

BRENTWOOD, TN 37027
OCT 17 2017
USPS
Postmark Here

Sent To BUERGER, MOSELEY & CARSON, LISA CARSON
Street and Apt. No., or PO Box No. 306 PUBLIC SQUARE
City, State, ZIP+4 FRANKLIN TN 37064

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BUERGER, MOSELEY & CARSON
ATTN: LISA M. CARSON
306 PUBLIC SQUARE
FRANKLIN, TN 37064

COMPLETE THIS SECTION ON DELIVERY

A. Signature X ☐ Agent ☐ Addressee
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7017 0190 0000 6516 2959

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

FAWN FENTON
1986 SUNNY SIDE DR.
BRENTWOOD, TN 37027

261

262

IN THE SUPREME COURT OF TENNESSEE
AT JACKSON
June 2, 2016 Session Heard at Nashville

STATE OF TENNESSEE v. JAMES ROBERT CHRISTENSEN, JR.

Appeal by Permission from the Court of Criminal Appeals
Circuit Court for Tipton County
No. 7799 Joseph H. Walker III, Judge

No. W2014-00931-SC-R11-CD – Filed April 7, 2017

SHARON G. LEE, J., dissenting.

The maxim, "every man's house is his castle," is deeply rooted in our jurisprudence. *Weeks v. United States*, 232 U.S. 383, 390 (1914). It applies whether the house is a castle or a cottage—a mansion or a mobile home.[1] The right to retreat into the privacy of one's home and be free from governmental intrusion is a basic tenet of the Fourth Amendment to the United States Constitution and Article I, section 7 of the Tennessee Constitution. Our homes and adjoining land are protected spaces; governmental officers must have a warrant, absent special circumstances, to intrude onto this private area.

Today, the Court holds that the posting of multiple "No Trespassing" signs is not enough to protect our constitutional rights against a warrantless search and that it may take "a fence and a closed gate that physically block access to the front door of a house" to revoke the implied license to enter the land around a residence.

I disagree that we must barricade our homes with a fence and a closed gate, and perhaps even a locked gate, to protect our constitutional rights against warrantless searches. This option is rarely convenient, affordable, practical, or even possible. Revocation of implied consent to enter one's property should be available to all—not just to those citizens who can afford to erect a fence and a gate and live in an area where this form of barricade is possible.

---

[1] "The poorest man may in his cottage bid defiance to all the forces of the Crown. It may be frail; its roof may shake; the wind may blow through it; the storm may enter; the rain may enter; but the King of England cannot enter—all his force dares not cross the threshold of the ruined tenement!" *Miller v. United States*, 357 U.S. 301, 307 (1958) (quoting remarks of William Pitt, Earl of Chatham, during 1763 debate in Parliament) (internal quotation marks omitted).

A search occurs when the government obtains information through an actual physical intrusion into a constitutionally protected area[2] or by violating a person's reasonable expectation of privacy.[3] By ignoring the "No Trespassing" signs, the officers physically intruded into Mr. Christensen's constitutionally protected area and violated his reasonable expectation of privacy.

Physical Intrusion

A person's right to retreat into his home and be free from unreasonable government searches and seizures stands at the very core of the Fourth Amendment's protections.[4] "This right would be of little practical value if the State's agents could stand in a home's porch or side garden and trawl for evidence with impunity . . . ." *Jardines*, 133 S. Ct. at 1414. The protections of the Fourth Amendment extend to the curtilage of a home. *Id.* (quoting *Oliver v. United States*, 466 U.S. 170, 180 (1984)).

Visitors have an implied license to enter another person's property and step onto the front porch. The Supreme Court has held that "'the knocker on the front door is treated as an invitation or license to attempt an entry, justifying ingress to the home by solicitors, hawkers and peddlers of all kinds.'" *Id.* at 1415 (quoting *Breard v. Alexandria*, 341 U.S. 622, 626 (1951)).[5] This license also extends to law enforcement. *Id.* at 1416 ("[A] police officer not armed with a warrant may approach a home and knock, precisely because that is 'no more than any private citizen might do.'" (quoting *King*, 563 U.S. at 469)).

A citizen may revoke the public's implied license to enter his property. Police officers may lawfully "knock and talk" at a citizen's front door without having probable cause or reasonable suspicion, but *not* when the citizen has expressly revoked the implied

---

[2] *Florida v. Jardines*, 133 S. Ct. 1409, 1414 (2013) (quoting *United States v. Jones*, 565 U.S. 400, 406 n.3 (2012)).

[3] *Katz v. United States*, 389 U.S. 347, 360 (1967) (Harlan, J., concurring); *see also Jardines*, 133 S. Ct. at 1417.

[4] *Silverman v. United States*, 365 U.S. 505, 511 (1961); *see also Kentucky v. King*, 563 U.S. 452, 474 (2011) (Ginsburg, J., dissenting) ("In no quarter does the Fourth Amendment apply with greater force than in our homes . . . .").

[5] *See also State v. Cothran*, 115 S.W.3d 513, 522 (Tenn. Crim. App. 2003) ("A sidewalk or pathway leading from a public street to the front door of a residence represents an 'implied invitation' to the public to use the pathway in pursuing legitimate business or social interests with those inside the residence." (quoting *State v. Harris*, 919 S.W.2d 619, 623 (Tenn. Crim. App. 1995))).

license to enter. *State v. Blackwell*, No. E2009-00043-CCA-R3-CD, 2010 WL 454864, at *7 (Tenn. Crim. App. Feb. 10, 2010).[6]

Mr. Christensen sufficiently revoked the public's implied license to enter his property by posting multiple "No Trespassing" and "Private Property" signs near the entrance to his driveway. A person need not have a law degree or an understanding of the various legal nuances of "trespass" discussed by the Court to know that these signs meant visitors were not welcome. Ms. Tammy Atkins, who visited homes in the area to share her faith, understood the meaning of the signs. She testified there were several "No Trespassing" signs near Mr. Christensen's driveway, and she did not go to houses that had "No Trespassing" signs.

Courts across the country have taken different approaches when determining whether an individual has revoked the public's implied license for entry onto his property. In Tennessee, the Court of Criminal Appeals has held that "No Trespassing" signs, even without physical barriers such as fences and gates, are sufficient to revoke the public's implied license to enter. *Blackwell*, 2010 WL 454864, at *7 (acknowledging that a "knock and talk" is generally a lawful technique absent express orders against trespass, but the presence of a "No Trespassing" sign evidences a subjective expectation of privacy and a revocation of the implied license to enter the property); *State v. Draper*, No. E2011-01047-CCA-R3-CD, 2012 WL 1895869, at *1, *6 (Tenn. Crim. App. May 24, 2012) (quoting *Blackwell*, 2010 WL 454864, at *7) (ruling a search was illegal where an officer bypassed the front door, entered the backyard, and knew that the owner had posted "No Trespassing" signs, which effectively revoked the implied invitation of the front door); *see also State v. Henry*, No. W2005-02890-CCA-R3-CD, 2007 WL 1094146, at *5 (Tenn. Crim. App. Apr. 11, 2007) (holding a "knock and talk" permissible but noting that if there had been evidence that "No Trespassing" signs were present at the time of the search, the "knock and talk" would have been unacceptable).

---

[6] *See also United States v. Taylor*, 458 F.3d 1201, 1204 (11th Cir. 2006) ("'Absent express orders from the person in possession,' an officer may 'walk up the steps and knock on the front door of any man's "castle," with the honest intent of asking questions of the occupant thereof.'" (quoting *Davis v. United States*, 327 F.2d 301, 303 (9th Cir. 1964))); *United States v. Cormier*, 220 F.3d 1103, 1109 (9th Cir. 2000) (quoting *Davis*, 327 F.2d at 303); *United States v. Taylor*, 90 F.3d 903, 909 (4th Cir. 1996) (quoting *United States v. Hersh*, 464 F.2d 228, 230 (9th Cir. 1972)); *United States v. Holmes*, 143 F. Supp. 3d 1252, 1259 (M.D. Fla. 2015) (holding that a person may revoke the implied license but must do so expressly (quoting *Taylor*, 458 F.3d at 1204)); *State v. Grice*, 767 S.E.2d 312, 319 (N.C. 2015) (finding that the implied license to approach the front doors of homes may be limited or rescinded by clear demonstrations by the homeowners (citing *Jardines*, 133 S. Ct. at 1415–16)), *cert. denied*, 135 S. Ct. 2846 (2015).

These Tennessee cases are consistent with decisions from other jurisdictions that have also determined that "No Trespassing" signs, without physical barriers, are sufficient for a person to preserve his privacy and revoke the implied license to enter his property. *See Powell v. State*, 120 So. 3d 577, 584 (Fla. Dist. Ct. App. 2013), *on reh'g* (Aug. 1, 2013) (stating that homeowners who post "No Trespassing" or "No Soliciting" signs effectively negate the license to enter the property and conduct a "knock and talk"); *State v. Roubique*, 421 So. 2d 859, 861–62 (La. 1982) (finding a "Private Road, No Trespassing" sign at the entrance to the driveway was ample evidence of the resident's intent to preserve his privacy); *see also State v. Poulos*, 942 P.2d 901, 904 (Or. Ct. App. 1997) (indicating that "No Hunting or Trespassing Under Penalty of Law," "KEEP OUT," "Guard Dog on Duty," and "STOP" signs posted along the driveway were sufficient to communicate the property owner's intent to exclude the public even without a gate or barrier).[7]

In other jurisdictions, courts have held that the expectation of privacy and desire to restrict entry can be effectuated by either physical barriers *or* appropriate signage. *See People v. Scott*, 593 N.E.2d 1328, 1338 (N.Y. 1992) (holding that "where landowners fence or post 'No Trespassing' signs on their private property or, by some other means, indicate unmistakably that entry is not permitted, the expectation that their privacy rights will be respected and that they will be free from unwanted intrusions is reasonable"), *quoted in State v. Bullock*, 901 P.2d 61, 74 (Mont. 1995); *Dixson*, 766 P.2d at 1024 (stating that signs, such as "No Trespassing" signs, fences, or other similar measures indicate the property owner's intent to protect privacy and exclude the public); *Cooksey v. State*, 350 S.W.3d 177, 184 (Tex. Ct. App. 2011) (stating that a homeowner may manifest an expectation of privacy, restrict access to pathways leading to the house, and revoke the implied license by erecting a locked gate or by posting "No Trespassing" signs); *see also State v. Hubbel*, 951 P.2d 971, 977 (Mont. 1997) (holding that the property owner had no reasonable expectation of privacy in the property leading to the front door where the property owner did not erect a fence, place a gate, plant shrubs or

[7] Under this approach, signs may be sufficient to revoke the implied license, but they must be appropriately worded and placed. *See Holmes*, 143 F. Supp. 3d at 1262 (noting that other courts have required that the revocation of the implied license be accomplished by clear demonstrations that are unambiguous and obvious to the casual visitor); *State v. Kapelle*, 344 P.3d 901, 905 (Idaho Ct. App. 2014) (noting that where a "No Trespassing" sign is ambiguous and not clearly posted, the implied license is not revoked); *State v. Howard*, 315 P.3d 854, 860 (Idaho Ct. App. 2013) (finding that the implied license had not been revoked because the "No Trespassing" sign was very small and not easily noticed, was not posted over or next to the entrance to the curtilage, and was over a mile from the actual residence); *State v. Dixson*, 766 P.2d 1015, 1024 (Or. 1988) (en banc) (finding that "No Hunting" signs were insufficient to communicate to law enforcement an intent to exclude non-hunting access).

bushes, or post "No Trespassing" or other signs), *as modified on denial of reh'g* (Feb. 3, 1998).

Another approach taken by courts in other jurisdictions is to determine whether the public's implied license to enter has been revoked by considering the totality of the circumstances, with a "No Trespassing" or similar signage a factor to be considered. *See Powell*, 120 So. 3d at 584 (finding that the existence and extent of a license to conduct a "knock and talk" depends on the circumstances); *Jones v. State*, 943 A.2d 1, 12 (Md. Ct. Spec. App. 2008) (finding that "No Trespassing" signs may be considered as part of the totality of the circumstances); *State v. Kuchera*, Nos. 27375-6-II, 27376-4-II, 2002 WL 31439839, at *5 (Wash. Ct. App. Nov. 1, 2002) (holding that the presence of "No Trespassing" signs "is not dispositive of the establishment of privacy, but is a factor to be considered 'in conjunction with other manifestations of privacy'" (quoting *State v. Johnson*, 879 P.2d 984, 992 (Wash. Ct. App. 1994))).

Under any of these approaches and particularly under existing Tennessee law, Mr. Christensen revoked the public's implied license to enter his property. Near the entrance to his driveway, he posted two signs that said "PRIVATE PROPERTY, NO TRESPASSING" and one sign that said "NO TRESPASSING, HUNTING OR FISHING, VIOLATORS PROSECUTED, UNDER PENALTY OF LAW" and listed his phone number. These signs were clearly visible to anyone approaching his driveway from the main road. Even in the absence of a fence or other physical barrier, the signs effectively communicated Mr. Christensen's intent to protect his privacy and exclude others from approaching his home. As the Idaho Supreme Court has said, "[C]itizens, especially those in rural areas, should not have to convert the areas around their homes into the modern equivalent of a medieval fortress in order to prevent uninvited entry by the public, including police officers." *State v. Christensen*, 953 P.2d 583, 587 (Idaho 1998).

The Court appears to adopt the totality of the circumstances approach but then determines that an objectively reasonable person faced with a "No Trespassing" sign would not conclude that entry is barred. I disagree. Common sense tells us that "No Trespassing" signs, depending on the circumstances, can communicate the property owner's desire not to have members of the public on his land.[8] Moreover, a "No

[8] *Cf. Madruga v. County of Riverside*, 431 F. Supp. 2d 1049, 1061 (C.D. Cal. 2005) (noting that even if signs do not contain the words "No Trespassing" or "Keep Away" "[c]ommon sense and common experiences teaches us that such 'WARNING Guard Dog' signs are placed to dissuade people, be they intruders, sales representatives, delivery agents, or even police officers, from approaching the home. . . . [A]nyone seeing such a sign would understand that the homeowner seeks to exclude them from entering the area beyond the sign.").

Trespassing" sign should be of particular significance to law enforcement officers in communicating that they may need to obtain a warrant before entering the property.

"No Trespassing" signs factor into criminal trespass cases. In Tennessee, it is a crime to enter or remain on property without the owner's consent. Tenn. Code Ann. § 39-14-405(a). A defense to this crime is that the alleged trespasser reasonably believed that he had the owner's consent to enter the property. *Id.* § 39-14-405(b)(1). However, this defense is not available if the property owner has posted signs "visible at all major points of ingress to the property . . . and the signs are reasonably likely to come to the attention of a person entering the property." *Id.* § 39-14-405(c).

Mr. Christensen did not just post one "No Trespassing" sign—he posted multiple signs near the entrance to his property that were clear, unambiguous, and obvious to anyone approaching his driveway. These signs adequately communicated Mr. Christensen's intent to revoke the implied license to enter his property. Under the facts of this case, law enforcement officers should have heeded the signs and taken the appropriate steps to obtain a search warrant.

Expectation of Privacy

Without a physical intrusion, a search can occur when the government violates a subjective expectation of privacy that society is prepared to recognize as reasonable. *Katz*, 389 U.S. at 361 (Harlan, J., concurring).[9] To determine whether a search has occurred under the *Katz* analysis, courts consider whether the individual had an actual, subjective expectation of privacy and whether society will view the individual's subjective expectation of privacy as reasonable and justifiable under the circumstances. *State v. Talley*, 307 S.W.3d 723, 730 (Tenn. 2010) (quoting *State v. Munn*, 56 S.W.3d 486, 494 (Tenn. 2001)).

In deciding whether Mr. Christensen had an actual, subjective expectation of privacy, we apply a multi-factor test that inquires into whether the defendant owns the property seized; has a possessory interest in the thing seized and the place searched; has the right to exclude others from that place; has shown a subjective expectation that the

[9] *See also Jardines*, 133 S. Ct. at 1417 ("The *Katz* reasonable-expectations test 'has been *added to*, not *substituted for*,' the traditional property-based understanding of the Fourth Amendment, and so is unnecessary to consider when the government gains evidence by physically intruding on constitutionally protected areas."); *Jones*, 565 U.S. at 407 ("*Katz* did not erode the principle 'that, when the Government *does* engage in physical intrusion of a constitutionally protected area in order to obtain information, that intrusion may constitute a violation of the Fourth Amendment.'" (quoting *United States v. Knotts*, 460 U.S. 276, 286 (1983) (Brennan, J., concurring))).

place would remain free from governmental invasion; took normal precautions to maintain his privacy; and was legitimately on the premises. *State v. Ross*, 49 S.W.3d 833, 841 (Tenn. 2001) (quoting *United States v. Haydel*, 649 F.2d 1152, 1154–55 (5th Cir. 1981)); *see also Talley*, 307 S.W.3d at 730–31.

Under this test, Mr. Christensen had an actual, subjective expectation of privacy in his property. He owned the property, had a possessory interest in the place searched, had the right to exclude others from the property, showed a legitimate interest in keeping others off his property, took precautions to maintain his privacy by posting multiple "No Trespassing" signs, and was legitimately on the premises.

To determine whether society views Mr. Christensen's subjective expectation of privacy as reasonable and justifiable, we consider factors such as the "intention of the Framers of the Fourth Amendment, the uses to which the individual has put a location, and our societal understanding that certain areas deserve the most scrupulous protection from government invasion." *Oliver*, 466 U.S. at 177–78 (citations omitted).

Privacy expectations are heightened in the home and the adjacent area. *See Dow Chem. Co. v. United States*, 476 U.S. 227, 237 n.4 (1986). The Court in *Katz* held that "[w]hat a person knowingly exposes to the public, even in his own home or office, is not a subject of Fourth Amendment protection. But *what he seeks to preserve as private*, even in an area accessible to the public, *may be constitutionally protected*." *Katz*, 389 U.S. at 351 (emphases added) (citations omitted).

Mr. Christensen did not expose his home and the adjoining property to the public; instead, he tried to protect his property by posting multiple signs clearly communicating that visitors were not welcome. If multiple "No Trespassing" signs are not sufficient to convey a property owner's intent to exclude the public from his property, then the constitutional protections against unreasonable searches may be beyond the grasp of ordinary citizens for whom the posting of "No Trespassing" signs is the only feasible option.

Mr. Christensen's expectation of privacy by the posting of multiple "No Trespassing" signs was reasonable and justifiable under the circumstances. Police officers violated Mr. Christensen's reasonable expectation of privacy when they entered his land without a warrant despite the "No Trespassing" signs.

Conclusion

For the reasons stated, law enforcement officers conducted an illegal search of Mr. Christensen's property, and the evidence obtained from the search should be suppressed.

The Court's decision that multiple "No Trespassing" signs are not sufficient to revoke the implied license for entry denies ordinary citizens the protections of the United States and the Tennessee Constitutions against warrantless searches. The result is that only citizens wealthy enough and situated in an area where they can "convert the areas around their homes into the modern equivalent of a medieval fortress," *Christensen*, 953 P.2d at 587, may protect themselves from governmental intrusion and invasion of privacy.

SHARON G. LEE, JUSTICE

TNJ:On the Hill

The Tennessee Journal's updates on Tennessee government & politics

« More legislator campaign spending: 3 bought passports, 10 paid family
Trump announces Sen. Mark Green as Army Secretary »

Tom Humphrey

TN Supreme majority: Police can ignore 'no trespassing' signs

Published April 7, 2017 | By Tom Humphrey

News release from Administrative Office of the Courts

Nashville, Tenn. – A majority of the Supreme Court has ruled that, despite the existence of "no trespassing" signs near an unobstructed driveway, police officers' warrantless entry onto the defendant's property was constitutionally permissible.

This matter arose when two investigators went to a different residence after receiving information regarding a pseudoephedrine purchase. One of the individuals at that residence informed the officers that he had given the pills to the defendant, who lived next door and who was in the process of using them to produce methamphetamine. The officers then left that residence and drove down the defendant's unobstructed driveway and walked up to his front porch.

Upon smelling the odor of the manufacture of methamphetamine when the defendant opened his door, the officers requested consent to enter the residence. When the defendant denied consent, the officers forced entry and discovered an active methamphetamine lab, several inactive labs, various items commonly associated with methamphetamine manufacture, and several guns.

Prior to trial, the defendant filed a motion to suppress evidence obtained as a result of the warrantless entry onto his property, claiming that, because he had posted "No Trespassing" signs near his driveway, the officers' entry onto the property without a warrant violated both the United States and Tennessee Constitutions.

The trial court denied the defendant's motion to suppress. The defendant then proceeded to trial and was convicted by a jury of resisting arrest, promoting the manufacture of methamphetamine, initiating the manufacture of methamphetamine, and two counts of possession of a firearm during the commission of a dangerous felony.

The Supreme Court granted the defendant's application for permission to appeal from the Court of Criminal Appeals' decision affirming the trial

ABOUT THIS BLOG

Former Knoxville News Sentinel capitol bureau chief Tom Humphrey writes about Tennessee politics, government, and legislative news.

Subscribe by Email

Enter your email address to subscribe to this blog and receive notifications of new posts by email.

Email *

Subscribe

Search

Recent Posts

- In 6th Congressional District, Rose takes big money lead over Matheny with $250K loan and Haslam help
- Boyd camp fires back at Black: 'This is Tennessee, not DC'
- U.S. Senate panel

court judgments in order to consider the legality of the police officers' warrantless entry onto the defendant's property.

In the majority opinion authored by Chief Justice Jeffrey S. Bivins, the Court determined that the defendant "failed to demonstrate that he had a reasonable expectation that ordinary citizens would not occasionally enter his property by walking or driving up his driveway and approaching his front door to talk with him 'for all the many reasons that people knock on front doors.'" Therefore, the Court held, the police officers' warrantless entry did not violate the United States or Tennessee Constitutions.

Justice Sharon G. Lee dissented from the Court's decision. She concluded that the police had no right to ignore the multiple "No Trespassing" signs Mr. Christensen posted at the entrance to his driveway and enter the area around his home without first getting a warrant. As a result, the search of Mr. Christensen's home violated his rights under the United States and Tennessee Constitutions. Justice Lee wrote that citizens should not have to barricade their homes with a fence and a closed gate, perhaps even a locked gate, to protect their constitutional rights. In Justice Lee's view, the ability to prevent the public, including the police, from entering one's home and the land around it should be available to all citizens.

Note: The majority ruling is HERE. Justice Lee's dissenting opinion is HERE.

votes to confirm Overbey as U.S. attorney for East TN
- Attorneys General reach $120M settlement with General Motors
- TN unemployment rate falls to lowest level ever recorded (again)

Archives

- October 2017
- September 2017
- August 2017
- July 2017
- June 2017
- May 2017
- April 2017
- March 2017
- February 2017
- January 2017
- December 2016
- November 2016
- October 2016

Home | Copyright/Reprint Policy | Press
Copyright © The Tennessee Journal 2017. All Rights Reserved. 1.800.727.5257

BUERGER, MOSELEY & CARSON, PLC
Williamson County Attorneys
306 Public Square
Franklin, TN 37064
(615) 794-8850
(615) 790-8861 Fax

July 17, 2017

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

Dear Ms. Fenton,

This office represents Williamson County, including its Sheriff's Department, with regard to various matters. Your recent letter to Sheriff Jeff Long has been passed along to me for reply. While we are sorry that you were disappointed with Sheriff Long's previous letter, he is not, as Sheriff of Williamson County, in a position to give you legal advice. Your correspondence essentially seeks a series of legal opinions based upon hypothetical questions. It is not productive to continue to engage in debate with you about the implications of various actions you might or might not choose to take. We would encourage you to seek your own legal counsel for interpretation of these matters if you are dissatisfied with the Sheriff's responses.

Sincerely,

Lisa M. Carson

xc: Sheriff Jeff Long

Printed on recycled paper

Buerger, Moseley, & Carson, PLC
Williamson County Attorney's
304 Public Square
Franklin, TN 37064

NASHVILLE
TN 370
17 JUL '17
PM 2 L

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

37027-540486

277

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

Please send all correspondences Via U.S. Mail, standard post.

July 7, 2017

Via U.S. Mail and facsimile to (615) 790-5580

Sheriff Jeff Long
Williamson County Sheriff's Office
408 Century Court
Franklin, TN 37064
P: (615) 790-5560
F: (615) 790-5580

RE: Trespassing at Fawn Fenton's Residence

Dear Sheriff Long:

I received your letter dated June 7th, 2017, in response to my original correspondence with you. Thank you for taking the time to read my letter and for acknowledging your receipt of it; however, I am disappointed in the brevity of your response, and that you chose not to answer a single question that I had asked. I thought that your response would be one of surprise and apology, and hoped you would bring correction within your department so that such behavior does not persist or become routine. Regretfully, the wording of your response made me think that you not only dismissed my concerns, but that you might even condone your officers' actions on my property. This has been troubling me, with the "principal" of even greater concern than the unjust incidents in question.

Laws, as with all written words, are subject to interpretation. As I'm sure you know all too well, citizens and law enforcement alike tend to push the boundaries of the law to the outer edge of what they believe is "reasonably arguable". Perhaps this is part of human nature. However, I believe that the two WSCO officers trespassing and littering upon my property on May 24th, was a case where the "ends" most certainly did not justify the "means."

I would like to be more clear on "the extent of [WSCO] authority when entering property", so that I may more accurately understand and align my expectations.

Therefore, I am asking you again to please answer my questions below, to explain to me how your department views "no trespassing" situations:

1. In your letter, you say "It is our intent to abide by the controlling law at all times..." Specifically what do you interpret as the "controlling law" in this instance? As I am a bit of a code and rule enthusiast, can you please tell me exactly the document and sections to look up?

2. Is the "Majority Opinion of the Tennessee Supreme Court, as written by Chief Justice Jeffry S. Bivins, in the STATE OF TENNESSEE V. JAMES ROBERT CHRISTENSEN, JR. (No. W2014-00931-SC-R11-CD – Filed April 7, 2017)" the basis by which you believe that your deputies actions were legal?

3. In your interpretation, would (or should) the copy which I sent you of my new signs that I am posting on my property, legally dissuade your officers from entering my property again, under similar circumstances?

4. Would this signage alone be enough to legally prevent visitors (including your officers, other than the specific exceptions noted on the copy) from entering my property? Or do I need to include physical barriers, such as gates and fencing, to prevent unwanted people from entering?

I ask you again to please reply back to me, and to please devote some more time and thoroughness to my questions, that if nothing else I might have a better understanding of expectations in regards to my private property and trespassing concerns.

Thank you again for taking the time to read my letters. I appreciate your concern and devotion to Williamson County, and I eagerly await your response.

Sincerely,

Fawn Fenton

Homeowner and resident of 1986 Sunny Side Drive.

TRANSMISSION VERIFICATION REPORT

TIME : 07/07/2017 15:05
NAME : FEDEX OFFICE 0630
FAX : 615-269-0996
TEL : 615-269-9919
SER.# : U63314F4J711508

DATE,TIME	07/07 15:04
FAX NO./NAME	6157905580
DURATION	00:00:42
PAGE(S)	02
RESULT	OK
MODE	STANDARD ECM

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

FRANKLIN, TN 37064

OFFICIAL USE

Certified Mail Fee $3.35
Extra Services & Fees (check box, add fee as appropriate)
☒ Return Receipt (hardcopy) $0.00
☐ Return Receipt (electronic) $0.00
☐ Certified Mail Restricted Delivery $0.00
☐ Adult Signature Required $0.00
☐ Adult Signature Restricted Delivery $0.00
Postage $0.49
Total Postage and Fees $6.59

Postmark Here
STA NASHVILLE, TN 37217
JUL 07 2017
07/07/2017

7015 0640 0003 8051 1212

Sent To
SHERIFF JEFF LONG, WS37215-9398
Street and Apt. No., or PO Box No.
408 CENTURY CT.
City, State, ZIP+4®
FRANKLIN, TN 37064

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SHERIFF JEFF LONG
WILLIAMSON COUNTY SHERIFFS OFFICE
408 CENTURY CT.
FRANKLIN, TN 37064

9590 9403 0163 5120 4040 92

2. Article Number (Transfer from service label)
7015 0640 0003 8051 1212

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X
☐ Agent
☐ Addressee

B. Received by (Printed Name) C. Date of Delivery 7/8/17

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, April 2015 PSN 7530-02-000-9053 Domestic Return Receipt

UNITED STATES POSTAL SERVICE
TN 370
08 JUL '17
PM 5 L

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

FAWN FENTON
1986 SUNNY SIDE DR.
BRENTWOOD TN 37027

USPS TRACKING#

9590 9403 0163 5120 4040 92

281

Ms. Pawn Penton
1986 Sunny Side Dr.
Brentwood, TN 37027

SHERIFF JEFF LONG
WILLIAMSON COUNTY SHERIFF'S OFFICE
408 CENTURY CT.
FRANKLIN, TN 37027

282

283

WILLIAMSON COUNTY SHERIFF'S OFFICE
408 CENTURY COURT
FRANKLIN, TENNESSEE 37064
615.790.5604 OFFICE
615.595.1208 FAX
JEFFL@WILLIAMSON-TN.ORG

June 7, 2017

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

Dear Ms. Fenton:

I am in receipt of your letter dated May 30, 2017. We are always interested in hearing the concerns of citizens. Please be assured that the Sheriff's Office is cognizant of its duty to serve legally-issued process, and of the extent of it's authority when entering property to serve such process. It is our intent to abide by the controlling law at all times, and we will continue to do so.

Sincerely,

Jeff Long

Cc: Lisa Carson

284

WILLIAMSON COUNTY SHERIFF'S OFFICE
408 CENTURY COURT
FRANKLIN, TENNESSEE 37064

NEOPOST
06/07/2017
US POSTAGE $000.46[illegible]
ZIP 37064
041M11280540

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

37027$5404 R029

285

286

Fawn T. Fenton
1986 Sunny Side Drive
Brentwood, TN 37027

Please send all correspondences
Via U.S. Mail, standard post.

May 30, 2017

Via U.S. Mail and facsimile to (615) 790-5580

Sheriff Jeff Long
Williamson County Sheriff's Office
408 Century Court
Franklin, TN 37064
P: (615) 790-5560
F: (615) 790-5580

RE: WCSO Officers Trespassing, Harassing, Littering at Fawn Fenton's Residence

Dear Sheriff Long:

I would like to bring to your attention that recently, WCSO officers have broken the law trespassing on my property. Last week, two officers flagrantly disregarded my 'No Trespassing' signage and physical barriers, while attempting to intimidate me through needless repeated doorbell ringing and excessively loud pounding near my front door. They then mockingly wedged and taped more than a dozen yellow paper notices around the exterior of my residence, littering my property in an effort to embarrass me before my neighbors. I need this harassment to stop, and I am asking you to correct this behavior within your department and for WSCO officers to respect the privacy of my property in the future.

As I am often home alone, I like to rest assured that my property, my pets, and my person are safe and under my control. Therefore, my house is equipped with several video surveillance cameras that allow me to remotely monitor the immediate exterior curtilage around my home, including the driveway and front porch. For notice to the public, I have two large signs that say "STOP" No Trespassing! No Exceptions!" near the lower part of my driveway, one sign on each side, for people who might want to approach my house from the street (since the driveway is the only access up to the house). If a visitor comes up the driveway anyway, they will see at the front corner of the house, there is a sign that says "Monitored by Geoarm Security", which is the external company that monitors my house alarms. At the bottom of the steps leading to the front porch, there is a large sign that says "No Trespassing - This Property Protected by Video Surveillance - Trespassers Will Be Prosecuted". There are also highly visible adhesive signs on the garage man-door and the front door sidelite that say 'No Trespassing' and "Warning, Audio

287

and Video Recording in Use". There is a similar sign near the gate that separates the driveway from the back yard. Therefore, with all this signage clearly in place, in the past, both companies and individuals alike have consistently been extremely respectful of my property, my boundaries, and my privacy. No one, for a lack of "more specific instructions" or impenetrable barriers, has proceeded onto my property, with the only known exception being the recent actions of the WSCO. I have felt that it is very clear to the casual observer that I have a "reasonable expectation of privacy" on my property, especially near my home.

Despite this, your department has been trying to serve some kind of Civil Process to my husband, Jeff Fenton, and WSCO officers have committed criminal trespass (and possibly aggravated criminal trespass) in their efforts to get my attention. From the video and audio recordings I have from my security system, I can describe to you the exact events to which I am referring. It started on Monday, May 15, 2017 at 10:12 am, when a WSCO officer drove his vehicle up my driveway, parked at the top near the house, and walked to the front porch. He clearly saw the camera mounted in the upper corner of the porch ceiling as he rung my doorbell. He left a yellow slip of paper wedged in the seam of the storm door regarding the legal process he was attempting to serve, and at 10:15 am, backed his vehicle down the driveway and left. I retrieved the yellow notice that evening when I got home from work, and saw that it was addressed to "Jeffrey R. Fenton", and on it was printed to contact Deputy Gary Brown to retrieve the papers. I disregarded this notice, since it is not for me and I am under no obligation to deliver it. The officer can't even know for certain whether or not Jeff Fenton lives here or visits, and I am under no obligation to answer the door or accept any paperwork for Mr. Fenton.

Since I did not want any further visitors regarding my husband's business, I used a fluorescent yellow cargo strap which I strung approximately 18" to 24" above the ground between the two "No Trespassing" signs on the lower end of my driveway, and on Wednesday May 17, created a physical barrier so that a vehicle could not drive up my driveway without hitting or removing the strap. I also put a yellow strap across the railings of the steps blocking access to my front porch, as a secondary visual and physical barrier indicating that visitors were not welcome to the front door. On Monday, May 22, 2017 at 10:15 am, a WSCO officer drove by my property again, but this time upon seeing the barriers, did not attempt to come up the driveway, and instead left another identical yellow paper notice addressed to Jeffrey R. Fenton wedged behind the flag on my brick mailbox.

Then on Wednesday, May 24, 2017, two officers arrived at my residence at 8:02 am. The male officer parked a WSCO vehicle on the lower end of my driveway in front of the yellow strap barrier, while the female officer parked her unmarked vehicle in front of my neighbor's house. Then they exited their vehicles and proceeded to step over my strap barrier and walked up my driveway on foot. They walked to the front porch, and both ducked and crawled under the yellow strap barrier there to access the front porch. The male officer stood on the porch and rung the doorbell multiple times, while the female officer stood on the landing looking through my front windows, watching my dog bark and trying to discern if anyone might be home. The male officer tried to open the storm door, but found it locked, and then he pounded very loudly on the side of the sidelite frame and called out "Mr. Fenton!" At 8:06 am, the male officer folded and wedged two of the yellow notices in the frame of the storm door. The female officer, who had brought

with her a roll of what appeared to be clear packing tape, proceeded to tear off pieces of tape which she handed to him, and he taped three more yellow notices, two on the storm door and one on the sidelite, for a total of five yellow papers cluttering the face of my front door. The male officer rang the doorbell again, and they both looked directly at the video camera on the porch ceiling and waved. They then went back down the steps and crawled under the yellow strap and walked back to the driveway. At 8:09 am, both officers walked around the garage-side of the driveway, and the male officer wedged and taped several more yellow notices to the man-door at the side of the garage. The male officer took a quick look through the fence at the back yard before following the female officer back towards the front of the house. They both proceeded to walk in the grass alongside the driveway back to their vehicles. The female officer taped yet more yellow notice papers, one on to each of my "No Trespassing" signs, and the male officer put another one wedged in the mailbox flag. At 8:11 am, they both moved their vehicles such that one was on each side facing my driveway, and stayed parked on the street in front of my house until 8:21 am, when they finally drove away.

Clearly, these two officers were mocking my attempts to keep them and other trespassers off my property and away from my home. I am very disturbed at their blatant disregard of my signage and physical barriers, as well as for Tennessee's trespassing laws in general. Certainly, you are familiar with TCA 39-14-405 regarding Criminal Trespass, which clearly has no defense for the actions of these officers. Even TCA 39-14-406 regarding Aggravated Criminal Trespass appears relevant to this matter, stating: *(a) A person commits aggravated criminal trespass who enters or remains on property when: (1) The person* ***knows the person does not have the property owner's effective consent*** *to do so; and (2) The person intends, knows, or is reckless about whether such person's presence will cause fear for the safety of another…"* After taking down the numerous yellow notice papers from around my property, I had to have conversations with several of my neighbors, who had seen the officers repeated visits and the excess of yellow papers, and asked me if something was wrong and if they needed to be concerned about their own property. I believe this was part of the officers' intent on May 24th – to not only attempt to intimidate me, but also to draw the attention of my neighbors and bring embarrassment or negative attention to my situation.

I certainly hope that completely ignoring "No Trespassing" signage is not a formal policy within the WSCO, and that circumventing physical barriers without just cause is not a regular practice? These officers are not even pursuing anything related to a crime; this is just a civil legal notice. It is my understanding that Mr. Fenton has been under some financial difficulty, and I assume whatever your department has been asked to deliver is related to that, but I think it can't be very serious since Mr. Fenton has never had much in the way of income or assets to my knowledge. His and my finances are completely separate, and I do not need to get involved. Rather, your officers need to respect the privacy of my property! They are violating the Fourth Amendment of the Constitution and breaking Tennessee law to deliver some civil papers to someone with no criminal history that they can't even be sure might be found at this address. I would expect WSCO officers to be examples to other citizens of how to respect and uphold laws, not to demonstrate the disrespectful invasiveness shown by these two that were at my home on May 24th.

I have now posted new signs around my property, a copy of which is attached to this letter, which I hope will make it expressly clear who I expect to allow on my property and under what circumstances, so that there can be no argument about "implied consent" or that "not every entry onto personal property is a search." In order to get these signs up quickly (several are now posted as of May 25th), I just printed them on my computer and had them laminated; however, I intend to replace my current "No Trespassing" signs with professionally manufactured larger signs showing this content. I am requesting your feedback on the verbiage of this sign, a statement from you on whether you believe this sign is sufficient to legally protect me against unannounced and undesired visitors. I would appreciate a written letter from you in response. In particular, if I post this sign (or multiple copies of it) at the entrance to my property, will the sign(s) alone be sufficient to convey my intent, so that I can remove the strap (physical barrier) across my driveway? I would prefer to secure my expectation of privacy with only signage, rather than persisting with physical obstacles, but please let me know your and your department's interpretation of privacy requirements.

In addition, I am requesting that you review with your entire department the legal boundaries of trespassing, and how your officers should interpret signage and barriers. The conduct of these two officers at my property on May 24th was what NOT what "a reasonably respectful citizen would be expected to do" given the signage and barriers present, even if they believed they had legitimate business to conduct with me. Your officers need to be able to objectively look at the communication presented by 'No Trespassing' signage and barriers, and conclude whether "a reasonable person" would proceed onto private property, law enforcement or not. I hope that you can assure me that I will not have officers in the future who encroach onto my property without more urgent reasons. Specifically, I would like the names and badge numbers of the two officers who papered my property on May 24th, and acknowledgement that they understand my intent and privacy expectations. Please respond to me about this also, via letter.

As I mentioned, I have video recordings from my security system of each time WSCO officers visited my home, and some audio recordings as well. Several different cameras from multiple angles show exactly how they acted unreasonably. I hope that by writing you this letter and asking for your cooperation, there will be no need for me to show these videos to my legal counsel, or to share these videos with others, to let people know what to expect when private property is posted simply with 'No Trespassing'. If you can give me assurance that my property boundaries will be respected by WSCO officers from now on, I will be very appreciative and it will ease the concerns of my neighbors. Thank you for your attention to this matter.

Sincerely,

Fawn Fenton

Fawn Fenton

Homeowner and resident of 1986 Sunny Side Drive.

290

FENTON RESIDENCE

1986 Sunny Side Drive

NO TRESPASSING (T.C.A. § 39-14-405)

DELIVERIES: Please Leave at the Garage.

VISITORS: Confirmed Appointment Required in Advance.

EMERGENCIES: Ambulance & Fire Services Permitted to Protect Life and Property.

ALL OTHER IMPLIED LICENSE TO ENTER IS HEREBY REVOKED.

Absolutely NO ENTRY to LAW ENFORCEMENT,

except when responding to an alarm or distress call from within this residence.

"Knock-and-Talk" is expressly Forbidden.

Please don't proceed past the ditch,

unless invited onto this property by the owners, or meeting the conditions above.

Audio & Video Surveillance in Use ~ Violators will be Prosecuted.

291

TRANSMISSION VERIFICATION REPORT

TIME : 05/31/2017 08:46
NAME : FEDEX OFFICE 0530
FAX : 615-269-0996
TEL : 615-269-9919
SER.# : U63314F4J711508

DATE,TIME	05/31 08:44
FAX NO./NAME	6157905580
DURATION	00:02:04
PAGE(S)	05
RESULT	OK
MODE	STANDARD ECM

292

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

FRANKLIN, TN 37064 STA NASHVILLE, TN OFFICIAL USE

7015 0640 0003 8051 1229

Certified Mail Fee $3.3[illegible] 0291 01
Extra Services & Fees (check box, add fee as appropriate)
- Return Receipt (hardcopy) $ $0.00
- Return Receipt (electronic) $ $0.00
- Certified Mail Restricted Delivery $ $0.00
- Adult Signature Required $ $0.00
- Adult Signature Restricted Delivery $

Postage $0.69
Total Postage and Fees $3.84

MAY 30 2017
05/30/2017
37215-9998

Sent To: SHERIFF JEFF LONG, WCSO
Street and Apt. No., or PO Box No.: 408 CENTURY COURT
City, State, ZIP+4®: FRANKLIN TN 37064

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

---

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SHERIFF JEFF LONG
WILLIAMSON COUNTY SHERIFFS OFFICE
408 CENTURY CT.
FRANKLIN, [redacted] TN 37064

9590 9403 0163 5120 4040 09

2. Article Number (Transfer from service label)
7015 0640 0003 8051 1229

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X T. Payne ☐ Agent ☐ Addressee

B. Received by (Printed Name): T Payne
C. Date of Delivery: 5-31-17

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

PS Form 3811, April 2015 PSN 7530-02-000-9053 Domestic Return Receipt

---

UNITED STATES POSTAL SERVICE
TN 370
31 MAY '17
FOLD

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

FAWN FENTON
1986 SUNNY SIDE DR.
BRENTWOOD, TN 37027

USPS TRACKING#
9590 9403 0163 5120 4040 04

293

CLERK & MASTER
2018 AUG 29 AM 9:22
FILED FOR ENTRY_____

April 27, 2018

Dear Betsy, Ronald & Jeff,

Please attach to trust documents.

I expect a good chance of getting dementia as I age – as both parents did. I plan to carefully conserve my money through these years. If I become incapacitated, I want the money to be used to keep me in my home with my dog and my books. It should be relatively easy to safeguard the doors so I only have access to the backyard. I do <u>not</u> want my children in the position of caring for me.

Thanks for your help,

Marsha A Fenton

CHANCELLOR MICHAEL W. BINKLEY
Williamson County Chancery Court

EXHIBIT - J

RE: Fenton v Fenton Case# 48419B

LOANS TO JEFFREY R. FENTON FROM MARSHA A. FENTON

10/03/2018	Check 2487	1000.00
10/30/2018	LCSW Terry Huff	75.00
11/13/2018	LCSW Terry Huff	100.00
12/06/2018	LCSW Terry Huff	150.00
12/20/2018	LCSW Terry Huff	100.00
1/03/2019	W. Meade Vet Clinic	219.22
1/07/2019	Check 2521	1000.00
1/07/2019	Check 2522	1000.00
1/08/2019	LCSW Terry Huff	100.00
1/15/2019	LCSW Terry Huff	100.00
1/22/2019	LCSW Terry Huff	100.00
1/31/2019	LCSW Terry Huff	100.00
2/12/2019	LCSW Terry Huff	100.00
2/26/2019	LCSW Terry Huff	100.00
2/27/2019	Check 2536	1000.00
2/27/2019	Check 2537	1000.00
3/12/2019	LCSW Terry Huff	100.00
3/26/2019	LCSW Terry Huff	100.00
4/09/2019	LCSW Terry Huff	100.00
4/15/2009	Check 2552	1000.00
4/17/2019	Check 2554	859.00
4/23/2019	LCSW Terry Huff	100.00
5/07/2019	LCSW Terry Huff	100.00
6/25/2019	LCSW Terry Huff	200.00
7/09/2019	LCSW Terry Huff	100.00
7/12/2019	Brittany Gates, Law	1500.00
7/23/2019	LCSW Terry Huff	100.00
7/29/2019	Schaffer Law Firm	4000.00
8/07/2019	Schaffer Law Firm	1000.00

Total – $15,103.22

8/25/2019

Marsha A Fenton 8/21/19

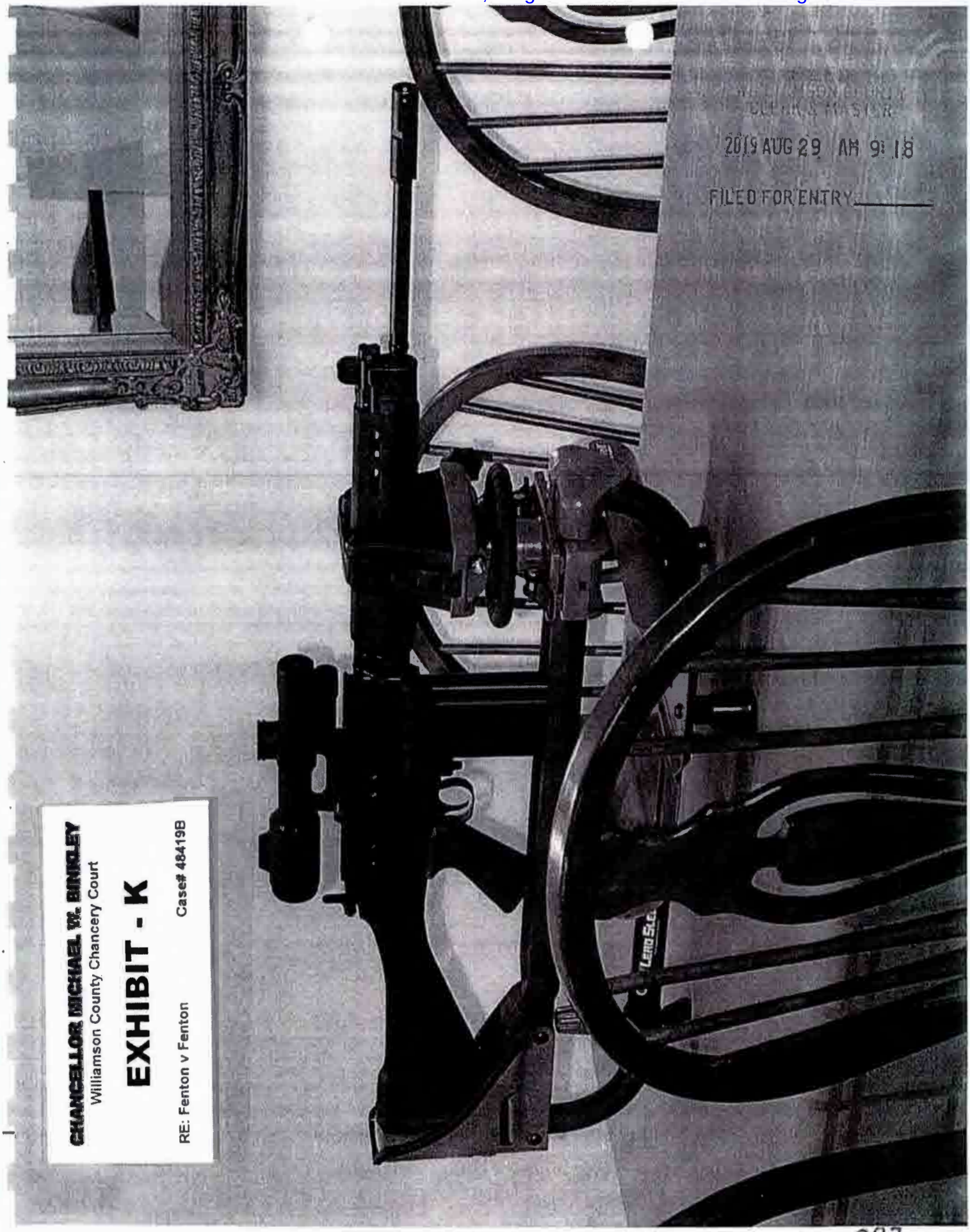
MARSHA A. FENTON

TERRI L WALKER
Notary Public, Genesee Co., MI
My Commission Expires Oct. 29, 2022
Acting in Genesee Co.

8/21/19

295

$15,103.22	Mom Loan as of 8/7/2019
$999.95	Current Charges
$297.35	USAA
$407.49	CreditOne
$331.98	Capital One
$17,131.99	Subtotal To Date
$500	Utilities
$3,000	Moving
$300	Storage
$20,939.99	Total Through Move

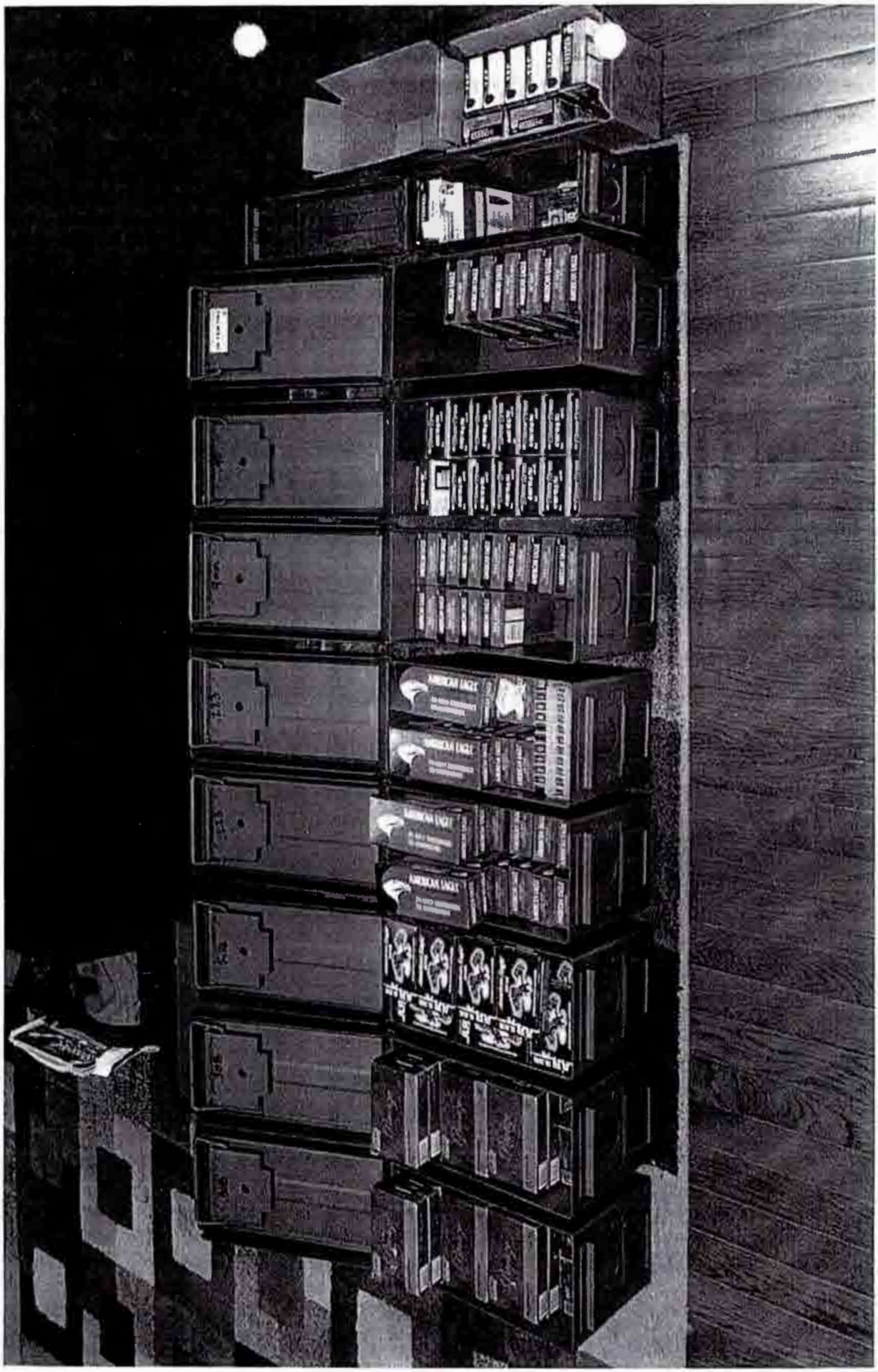

CHANCELLOR MICHAEL W. BINKLEY
Williamson County Chancery Court
EXHIBIT - K
RE: Fenton v Fenton
Case# 48419B
2019 AUG 29 AM 9:18
FILED FOR ENTRY

297

ALL FAMILY'S FIREARMS MUNITIONS + TRAINING

FRONT PAGE: FN-FAL .308
HERE: AR-15 M w/ VCOG OPTIC

298



5,180 Rounds of Fawn's Ammo

299

Fawn's Ammunitions: Taken During Separation

TOTAL ESTIMATED VALUE: **$1,993.41**

Fawn T. Fenton

[redacted] Brentwood, TN 37027

(615) 333-73[redacted]

Item #	Make / Model	Item / Description	Bullet Weight (Grains)	Muzzle Velocity (FPS)	Bullet Style	Serial Number / ID Number	Date Purchased
1	Federal American Eagle (XM193)	5.56 x 45mm	55	3,165	FMJ	Case UPC: 50029465094602	11/7/2016
2	Federal American Eagle (AE223)	.223 REM	55	3,240	FMJ-BT	Box UPC: 029465084820	2/4/2005
3	PMC Bronze (308B)	7.62 x 51mm (.308 WIN)	147	2,780	FMJ-BT	Case UPC: 20741569060282	11/8/2016
4	Hornady TAP (#80968)	7.62 x 51mm (.308 WIN)	168	2,700	TAP FPD	Box UPC: 090255809688	11/8/2016
5	Federal American Eagle (AE40R3)	.40 S&W Target	165	1,130	FMJ	Case UPC: 50029465092813	11/7/2016
6	CCI Blazer Brass (5210) A-08-K-23	.40 S&W Target	165	Unknown	FMJ	Box UPC: 076683052100	2/4/2005
7	Federal Premium HST LE (P40HST1)	.40 S&W Tactical	180	1,010	JHP	Box UPC: 029465094454	11/8/2016
8	Federal American Eagle (AE9AP)	9mm LUGER	124	1,150	FMJ	Box UPC: 029465088569	2/11/2010
9	Federal Premium HST LE (P9HST2)	9mm LUGER Tactical	147	1,000	JHP	Box UPC: 029465094447	11/8/2016
10	Federal Classic Hi-SHOK (C38J)	.38 SPECIAL +P	125	950	JSP	Box UPC: 029465092955	Unknown
11	Miscellaneous Ammo Boxes	.40 Federal | .22 CCI | .223 Winchester	Misc	Misc	Misc	Misc	Unknown
TOTALS	**INVENTORY ITEMS: 11**						

COUNTED, SIGNED-FOR, AND TAKEN BY FAWN ON 5/1/2018

300