UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	) DOCKET NO.: 3:16-CR-00307
	)
	) PLEA AGREEMENT
v.	)
	)
JAMIE BLUNDER	)
	)

NOW COMES the United States of America, by and through Jill Westmoreland Rose, United States Attorney for the Western District of North Carolina, and the defendant, Jamie Blunder, in person and through counsel, Yolanda Michelle Trotman, and respectfully inform the Court that they have reached an agreement pursuant to Federal Rule of Criminal Procedure ("Rule") 11. References to the United States herein shall mean the United States Attorney for the Western District of North Carolina.

I. Plea

1. The defendant agrees to enter a voluntary plea of guilty to Count I as set forth in the Bill of Indictment, and admits to being in fact guilty as charged in Count I.

2. If the Court finds the defendant's plea to be voluntary and knowingly made, and accepts the plea, then the United States will move at the appropriate time to dismiss Count II as to this defendant in the Bill of Indictment.

3. The defendant understands that each and every provision set forth below is a material term of the Plea Agreement. The defendant's failure to fully comply with any provision of the Plea Agreement, attempt to withdraw the guilty plea or violation of any federal, state or local law, or any order of any court, including any condition of pre-trial or pre-sentence, or post-sentence release, is a breach of the Plea Agreement.

4. In addition to any other remedy available in law, the defendant's breach (a) will relieve the United States of its obligations under the Plea Agreement, but the defendant will not be relieved of the defendant's obligations or allowed to withdraw the guilty plea; (b) may constitute the defendant's failure to accept responsibility under U.S.S.G. § 3E1.1; and (c) will permit the United States to proceed on any dismissed, pending, superseding or additional charges.

II. Sentence

5. The defendant is aware that the statutory minimum and maximum sentences for each count are as follows:



Count I: a violation of 21 U.S.C. § 841(a)(1)(A) and 21 U.S.C. § 846 (conspiracy to distribute cocaine); a minimum term of 10 years and a maximum term of life imprisonment, $ 10,000,000 fine, or both, and no more than 3 years supervised release.

6. The defendant understands that a violation of supervised release may subject the defendant to an additional period of incarceration.

7. The defendant is aware that the Court: (a) will consider the advisory *United States Sentencing Guidelines [U.S.S.G.]* in determining the sentence; (b) has not yet determined the sentence and any estimate of the likely sentence is a prediction rather than a promise; (c) has the final discretion to impose any sentence up to the statutory maximum for each count; and (d) is not bound by recommendations or agreements by the United States. Knowing this, the defendant understands that the defendant may not withdraw the plea as a result of the sentence imposed.

8. Pursuant to Rule 11(c)(1)(B), the parties agree that they will jointly recommend that the Court make the following findings and conclusions as to the U.S.S.G.:

a. The amount of cocaine that was known to or reasonably foreseeable by the defendant (including all relevant conduct under U.S.S.G. § 1B1.3) was at least 50 kilograms but less than 150 kilograms.

b. The United States agrees that the defendant's entry of plea is timely for purposes of U.S.S.G. § 3E1.1(b).

c. Notwithstanding any other recommendation herein, if the Court determines from the defendant's criminal history that U.S.S.G. § 4B1.1 (Career Offender) or U.S.S.G. § 4B1.4 (Armed Career Criminal) applies, such provision may be used in determining the sentence.

d. The parties agree that either party may seek a departure or variance from the "applicable guideline range" (U.S.S.G. § 5C1.1).

e. The United States will inform the Court and the probation office of all facts pertinent to the sentencing process and will present any evidence requested by the Court.

9. The defendant agrees to the following with respect to financial disclosures, monetary penalties, forfeiture and restitution:

a. To pay full restitution, regardless of the resulting loss amount, to all victims directly or indirectly harmed by the defendant's "relevant conduct," including conduct pertaining to any dismissed counts or uncharged conduct, as defined by U.S.S.G. §1B1.3, regardless of whether such conduct constitutes an "offense" under 18 U.S.C. §§ 2259, 3663 or 3663A.

b. To make full disclosure of all current and projected assets to the United States Probation Office immediately and prior to the termination of the defendant's

supervised release or probation, such disclosures to be shared with the United States Attorney's Office, including the Financial Litigation Unit, for any purpose.

c. To truthfully complete under penalty of perjury within thirty days of the execution of this Plea Agreement a financial statement provided by the United States Attorney's Office and to update the statement with material changes within seven days of the change.

d. That monetary penalties imposed by the Court will be (i) subject to immediate enforcement as provided for in 18 U.S.C. § 3613, and (ii) submitted to the Treasury Offset Program so that any federal payment or transfer of returned property the defendant receives may be offset and applied to federal debts but will not affect the periodic payment schedule.

10. With regard to each and every asset listed in the Bill of Indictment or seized in a related investigation or administrative, state, or local action the defendant stipulates and agrees:

a. To its forfeiture herein, if necessary as substitute property under 21 U.S.C. § 853(p), as made applicable by 18 U.S.C. § 982(b)(1) or any other statute, or in a separate administrative or civil judicial proceeding.

b. That the defendant has or had a possessory interest, or other legal interest, in each item or property.

c. To the entry of a money judgment in the amount specified in the Bill of Indictment.

d. To the Magistrate Judge conducting all proceedings necessary for any civil forfeiture of the property, including entry of judgment, pursuant to 28 U.S.C. § 636(c).

e. That the property may be returned to the true owner or treated as abandoned property.

f. To assist the United States in the recovery of all assets by (i) taking whatever steps are necessary or requested by the United States to pass clear title to the United States; (ii) preventing the disbursement of any monies and sale of any property or assets; (iii) not encumbering or transferring any real estate after the defendant's signing of this Plea Agreement; and (iv) directing all financial institutions to turn over and surrender to the United States all funds and records regarding accounts listed in any document signed by the defendant pursuant to this Plea Agreement, as criminal proceeds or substitute property.

11. The defendant waives all rights to notice of forfeiture under Rule 32.2 and of any other action or proceeding regarding such assets. The defendant consents and waives all rights to compliance by the United States with any applicable deadlines under 18 U.S.C. § 983(a). Any related administrative claim filed by the defendant is hereby withdrawn.

12. If the United States discovers that the defendant has not fully disclosed all assets, the United States may seek forfeiture of any subsequently-discovered assets, and the defendant agrees to the immediate forfeiture of any such assets.

13. The defendant further agrees to participate in the Inmate Financial Responsibility Program to fulfill all financial obligations due and owing under this agreement and the law.

III. Procedure

14. The defendant agrees that a duly-qualified federal Magistrate Judge may conduct the hearing required by Rule 11.

15. The defendant stipulates that there is a factual basis, as required by Rule 11(b)(3), for the plea of guilty. The defendant further stipulates that the defendant has read and understood the Factual Basis filed with this Plea Agreement, and that such Factual Basis may be used by the Court and the United States Probation Office without objection by the defendant to determine the applicable advisory guideline range or the appropriate sentence under 18 U.S.C. § 3553(a), unless the Factual Basis itself notes that the defendant's right to object to a particular fact(s) was explicitly reserved.

IV. Waivers

16. The defendant is aware that the law provides certain limited rights to withdraw a plea of guilty, has discussed these rights with defense counsel and knowingly and expressly waives any right to withdraw the plea once the Magistrate Judge has accepted it.

17. The defendant acknowledges that Rule 11(f) and Fed. R. of Evid. 408 and 410 are rules which ordinarily limit the admissibility of statements made by a defendant in the course of plea discussions. The defendant knowingly and voluntarily waives these rights and agrees that any statements made in the course of the defendant's guilty plea or this Plea Agreement (in part or in its entirety, at the sole discretion of the United States) and the Factual Basis will be admissible against the defendant for any purpose in any criminal or civil proceeding if the defendant fails to enter or attempts to withdraw the defendant's guilty plea, or in any post-conviction proceeding challenging the knowing or voluntary nature of the guilty plea.

18. The defendant agrees that by pleading guilty, the defendant is expressly waiving the right: (a) to be tried by a jury; (b) to be assisted by an attorney at trial; (c) to confront and cross-examine witnesses; and (d) not to be compelled to incriminate him or herself.

19. The defendant has discussed with his attorney: (1) defendant's rights pursuant to 18 U.S.C. § 3742, 28 U.S.C. § 2255, and similar authorities to contest a conviction and/or sentence through an appeal or post-conviction action after entering into a Plea Agreement; (2) whether there are potential issues relevant to an appeal or post-conviction action; and (3) the possible impact of any such issue on the desirability of entering into this Plea Agreement.

20. The defendant, in exchange for the concessions made by the United States in this Plea Agreement, waives all such rights to contest the conviction and/or sentence except for claims

of: (1) ineffective assistance of counsel or (2) prosecutorial misconduct. The defendant also knowingly and expressly waives all rights conferred by 18 U.S.C. § 3742 or otherwise to appeal whatever sentence is imposed with the two exceptions set forth above. The defendant agrees that the United States preserves all its rights and duties as set forth in 18 U.S.C. § 3742(b). Should the United States Sentencing Commission and/or Congress in the future amend the Sentencing Guidelines to lower the guideline range that pertains to the defendant's offense(s) and explicitly make such an amendment retroactive, the United States agrees that it will not assert this waiver as a bar to the defendant's filing a motion with the district court pursuant to 18 U.S.C. § 3582(c)(2). However, if the defendant files such a motion, the United States reserves the right to oppose the motion on any other grounds, and reserves the right to assert this waiver as a bar to an appeal from the district court's decision regarding the motion.

21. The defendant waives all rights, whether asserted directly or by a representative, to request or to receive from any department or agency any records pertaining to the investigation or prosecution of this case, including without limitation any records that may be sought under the Freedom of Information Act, 5 U.S.C. § 552, or the Privacy Act, 5 U.S.C. § 552a.

V. Effects of Plea

22. The defendant understands that if this case is governed by 18 U.S.C. §§ 3143(a)(2) and 3145(c) that a judicial officer shall order that a person who has been found guilty of an offense of this kind be detained, unless there are statutory justifications why such person's detention would not be appropriate.

23. The defendant recognizes that pleading guilty may have consequences, with respect to the defendant's immigration status, if the defendant is not a citizen of the United States. The defendant understands that no one can predict to a certainty the effect of the defendant's conviction(s) on the defendant's immigration status and wants to plead guilty regardless, even if the consequence is the defendant's automatic removal from the United States.

24. The parties stipulate that, pursuant to 21 U.S.C. §§ 862 and 862(a), the defendant will be ineligible for all federal benefits for five years after the date of sentencing. If the Court determines that this conviction is the second federal or state offense for distributing controlled substances, the defendant will be ineligible for all federal benefits for ten years after the sentencing. If the Court determines that this conviction is the third or subsequent such offense, the defendant will be permanently ineligible for all federal benefits.

VI. Assistance to United States

25. If requested by the United States, but only if so requested, the defendant agrees to cooperate with the United States, including but not limited to the following:

a. The defendant will provide truthful information about the subject charges and about any other criminal activity within the defendant's knowledge to any United States agent or agency that the United States designates.

b. The defendant will testify truthfully in any trial, hearing, or grand jury proceeding, including, but not limited to, testimony against any co-defendants, as the United States designates. Should the defendant testify at the request of the United States, the defendant hereby waives payment of any witness fees or expenses.

c. The defendant will be reasonably available for debriefing and pre-trial conferences as the United States may require.

d. The defendant will provide to the United States all documents or materials of any kind in the defendant's possession or under the defendant's care, custody, or control relating directly or indirectly to all areas of inquiry and investigation.

e. The defendant understands that the United States desires only truthful and accurate information and testimony and, in fact, that knowingly giving false information or testimony can be prosecuted as an additional criminal offense.

f. The defendant's obligation under this section is a continuing one, and will continue after sentencing until all investigations and/or prosecutions to which the defendant's cooperation may be relevant have been completed.

26. The United States and the defendant agree, once this Plea Agreement is effective, any prior agreements are superseded, and further statements of the defendant are governed solely by this Plea Agreement.

27. The United States agrees that information provided by the defendant pursuant to this Plea Agreement and about which the United States had no prior knowledge will not be used against the defendant by the United States in this or any other criminal proceeding, except that the United States may use any information the defendant provides:

a. Regarding crimes that involve violence;

b. In a prosecution for any crime committed by the defendant after the effective date of this Plea Agreement;

c. Derivatively, to pursue investigative leads, identify witnesses or to obtain evidence;

d. In response to any defense argument or evidence in any hearing or proceeding inconsistent with statements or information provided by the defendant; and

e. For any other purpose set forth in U.S.S.G. § 1B1.8(b).

28. Nothing in this agreement places any obligation on the United States to seek the defendant's cooperation or assistance. If the defendant so assists the United States:

a. The United States, in its sole discretion, will determine whether said assistance has been substantial.

b. Upon a determination that the defendant has rendered substantial assistance, the United States may make a motion pursuant to U.S.S.G. § 5K1.1 for imposition of a sentence below the applicable Sentencing Guidelines or pursuant to Rule 35(b) for a reduction in the defendant's term of imprisonment. The United States may also, within its sole discretion, move the Court pursuant to 18 U.S.C. § 3553(e) and/or Rule 35(b) to impose a sentence below any applicable statutory mandatory minimum.

29. Any determination that the defendant has failed to provide substantial assistance, or has knowingly provided false information, is within the sole discretion of the United States, and the defendant waives all objections and rights of appeal or collateral attack of such a determination. The defendant understands that if the United States makes a motion for reduction of sentence, the motion is not binding on the District Court.

VII. Conclusion

30. This agreement is effective and binding once signed by the defendant, the defendant's attorney, and an attorney for the United States. The defendant agrees to entry of this Plea Agreement at the date and time scheduled by the Court.

31. There are no agreements, representations, or understandings between the parties in this case, other than those explicitly set forth in this Plea Agreement, or as noticed to the Court during the plea colloquy and contained in writing in a separate document signed by all parties.

SO AGREED:

_____ DATED: _____

Lambert F. Guinn, Assistant United States Attorney

_____ DATED: _____

Yolanda Michelle Trotman, Attorney for Defendant

_____ DATED: _____

Jamie Blunder, Defendant

Declaration for Federal Employment

Form Approved
OMB No. 3206-0182

GENERAL INFORMATION

1. FULL NAME *(First, middle, last)*
◆ JAMIE BLUNDER

2. SOCIAL SECURITY NUMBER
◆ [redacted]

3. PLACE OF BIRTH *(Include city and state or country)*
◆ [redacted]

4. DATE OF BIRTH *(MM/DD/YYYY)*
◆ [redacted]

5. OTHER NAMES EVER USED *(For example, maiden name, nickname, etc)*
◆
◆

6. PHONE NUMBERS *(Include area codes)*
Day ◆ 336-451-4443
Night ◆ 336-451-4443

Selective Service Registration

If you are a male born after December 31, 1959, and are at least 18 years of age, civil service employment law (5 U.S.C. 3328) requires that you must register with the Selective Service System, unless you meet certain exemptions.

7a. Are you a male born after December 31, 1959? ☑ YES ☐ NO *If "NO" skip 7b and 7c. If "YES" go to 7b.*
7b. Have you registered with the Selective Service System? ☑ YES ☐ NO *If "NO" go to 7c.*
7c. If "NO," describe your reason(s) in item #16.

Military Service

8. Have you ever served in the United States military? ☐ YES *Provide information below* ☑ NO
If you answered "YES," list the branch, dates, and type of discharge for all active duty.
If your only active duty was training in the Reserves or National Guard, answer "NO."

Branch	From MM/DD/YYYY	To MM/DD/YYYY	Type of Discharge

Background Information

For all questions, provide all additional requested information under Item 16 or on attached sheets. The circumstances of each event you list will be considered. However, in most cases you can still be considered for Federal jobs.

For questions 9,10, and 11, your answers should include convictions resulting from a plea of *nolo contendere* (no contest), but omit (1) traffic fines of $300 or less, (2) any violation of law committed before your 16th birthday, (3) any violation of law committed before your 18th birthday if finally decided in juvenile court or under a Youth Offender law, (4) any conviction set aside under the Federal Youth Corrections Act or similar state law, and (5) any conviction for which the record was expunged under Federal or state law.

	YES	NO
9. During the last 10 years, have you been convicted, been imprisoned, been on probation, or been on parole? (Includes felonies, firearms or explosives violations, misdemeanors, and all other offenses.) *If "YES," use item 16 to provide the date, explanation of the violation, place of occurrence, and the name and address of the police department or court involved.*	☐	☑
10. Have you been convicted by a military court-martial in the past 10 years? *(If no military service, answer "NO.") If "YES," use item 16 to provide the date, explanation of the violation, place of occurrence, and the name and address of the military authority or court involved.*	☐	☑
11. Are you now under charges for any violation of law? *If "YES," use item 16 to provide the date, explanation of the violation, place of occurrence, and the name and address of the police department or court involved.*	☐	☑
12. During the last 5 years, have you been fired from any job for any reason, did you quit after being told that you would be fired, did you leave any job by mutual agreement because of specific problems, or were you debarred from Federal employment by the Office of Personnel Management or any other Federal agency? *If "YES," use item 16 to provide the date, an explanation of the problem, reason for leaving, and the employer's name and address.*	☐	☑
13. Are you delinquent on any Federal debt? benefits, and other debts to the U.S. Gov student and home mortgage loans.) *If " or default, and steps that you are taking*		
deral taxes, loans, overpayment of anteed or insured loans such as *ngth, and amount of the delinquency*	☐	☑

Exhibit H

Declaration for Federal Employment

Form Approved:
OMB No. 3206-0182

Additional Questions

14. Do any of your relatives work for the agency or government organization to which you are submitting this form? (Include: father, mother, husband, wife, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, and half sister.) *If "YES," use item 16 to provide the relative's name, relationship, and the department, agency, or branch of the Armed Forces for which your relative works.*

YES ☐ NO ☑

15. Do you receive, or have you ever applied for, retirement pay, pension, or other retired pay based on military, Federal civilian, or District of Columbia Government service?

YES ☐ NO ☑

Continuation Space / Agency Optional Questions

16. Provide details requested in items 7 through 15 and 18c in the space below or on attached sheets. Be sure to identify attached sheets with your name, Social Security Number, and item number, and to include ZIP Codes in all addresses. If any questions are printed below, please answer as instructed *(these questions are specific to your position and your agency is authorized to ask them).*

Certifications / Additional Questions

APPLICANT: If you are applying for a position and have not yet been selected, carefully review your answers on this form and any attached sheets. When this form and all attached materials are accurate, read item 17, and complete 17a.

APPOINTEE: If you are being appointed, carefully review your answers on this form and any attached sheets, including any other application materials that your agency has attached to this form. If any information requires correction to be accurate as of the date you are signing, make changes on this form or the attachments and/or provide updated information on additional sheets, initialing and dating all changes and additions. When this form and all attached materials are accurate, read item 17, complete 17b, read 18, and answer 18a, 18b, and 18c as appropriate.

17. I **certify** that, to the best of my knowledge and belief, all of the information on and attached to this Declaration for Federal Employment, including any attached application materials, is true, correct, complete, and made in good faith. I **understand that a false or fraudulent answer to any question or item on any part of this declaration or its attachments may be grounds for not hiring me, or for firing me after I begin work, and may be punishable by fine or imprisonment.** I **understand** that any information I give may be investigated for purposes of determining eligibility for Federal employment as allowed by law or Presidential order. I **consent** to the release of information about my ability and fitness for Federal employment by employers, schools, law enforcement agencies, and other individuals and organizations to investigators, personnel specialists, and other authorized employees or representatives of the Federal Government. I **understand** that for financial or lending institutions, medical institutions, hospitals, health care professionals, and some other sources of information, a separate specific release may be needed, and I may be contacted for such a release at a later date.

Appointing Officer:
Enter Date of Appointment or Conversion
MM / DD / YYYY

17a. Applicant's Signature: _____ Date _____
(Sign in ink)
Digitally signed for JAMIE BLUNDER by tsajobs_tsa_dhs_gov/candidates.aspx PKI
I officially submit these documents through the TSA EODonline system. Date 2013-07-17 23:55:48

17b. Appointee's Signature: _____ Date 2013-07-17 23:55
(Sign in ink)

18. **Appointee (Only respond if you have been employed by the Federal Government before):** Your elections of life insurance during previous Federal employment may affect your eligibility for life insurance during your new appointment. These questions are asked to help your personnel office make a correct determination.

18a. When did you leave your last Federal job? DATE: MM / DD / YYYY

	YES	NO	Do Not Know
18b. When you worked for the Federal Government the last time, did you waive Basic Life Insurance or any type of optional life insurance?	☐	☐	☐
18c. If you answered "YES" to item 18b, did you later cancel the waiver(s)? If your answer to item 18c is "NO," use item 16 to identify the type(s) of insurance for which waivers were not canceled.	☐	☐	☐

FILED: May 17, 2024

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-164
(3:16-cr-00307-RJC-1)

In re: JAMIE BLUNDER

Movant

ORDER

Movant has filed a motion under 28 U.S.C. § 2244 for an order authorizing the district court to consider a second or successive application for relief under 28 U.S.C. § 2255.

The court denies the motion.

Entered at the direction of Senior Judge Keenan with the concurrence of Judge Niemeyer and Judge Agee.

For the Court

/s/ Nwamaka Anowi, Clerk

EXHIBIT
I

UNPUBLISHED

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6885

UNITED STATES OF AMERICA,

Plaintiff - Appellee,

v.

JAMIE BLUNDER,

Defendant - Appellant.

Appeal from the United States District Court for the Western District of North Carolina, at Charlotte. Robert J. Conrad, Jr., District Judge. (3:16-cr-00307-RJC-DCK-1; 3:24-cv-00694-RJC)

Submitted: July 24, 2025 Decided: July 28, 2025

Before NIEMEYER, AGEE, and HEYTENS, Circuit Judges.

Dismissed by unpublished per curiam opinion.

Jamie Blunder, Appellant Pro Se.

Unpublished opinions are not binding precedent in this circuit.

EXHIBIT
J

FILED: July 28, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6885
(3:16-cr-00307-RJC-DCK-1)
(3:24-cv-00694-RJC)

UNITED STATES OF AMERICA

Plaintiff - Appellee

v.

JAMIE BLUNDER

Defendant - Appellant

JUDGMENT

In accordance with the decision of this court, a certificate of appealability is denied and the appeal is dismissed.

This judgment shall take effect upon issuance of this court's mandate in accordance with Fed. R. App. P. 41.

/s/ NWAMAKA ANOWI, CLERK

EXHIBIT
J2

PER CURIAM:

Jamie Blunder seeks to appeal the district court's order dismissing his 28 U.S.C. § 2255 motion as successive and unauthorized. The order is not appealable unless a circuit justice or judge issues a certificate of appealability. *See* 28 U.S.C. § 2253(c)(1)(B). A certificate of appealability will not issue absent "a substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c)(2). When, as here, the district court denies relief on procedural grounds, the prisoner must demonstrate both that the dispositive procedural ruling is debatable and that the motion states a debatable claim of the denial of a constitutional right. *Gonzalez v. Thaler*, 565 U.S. 134, 140-41 (2012) (citing *Slack v. McDaniel*, 529 U.S. 473, 484 (2000)).

We have independently reviewed the record and conclude that Blunder has not made the requisite showing. Accordingly, we deny a certificate of appealability and dismiss the appeal. We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

DISMISSED

EXHIBIT
J3

FILED: September 3, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6885
(3:16-cr-00307-RJC-DCK-1)
(3:24-cv-00694-RJC)

UNITED STATES OF AMERICA

Plaintiff - Appellee

v.

JAMIE BLUNDER

Defendant - Appellant

TEMPORARY STAY OF MANDATE

Under Fed. R. App. P. 41(b), the filing of a timely petition for rehearing or rehearing en banc stays the mandate until the court has ruled on the petition. In accordance with Rule 41(b), the mandate is stayed pending further order of this court.

/s/Nwamaka Anowi, Clerk

EXHIBIT
K

FILED: October 1, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6885
(3:16-cr-00307-RJC-DCK-1)
(3:24-cv-00694-RJC)

UNITED STATES OF AMERICA

Plaintiff - Appellee

v.

JAMIE BLUNDER

Defendant - Appellant

MANDATE

The judgment of this court, entered July 28, 2025, takes effect today.

This constitutes the formal mandate of this court issued pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure.

/s/Nwamaka Anowi, Clerk

EXHIBIT
L

FILED: October 3, 2025

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-6885
(3:16-cr-00307-RJC-DCK-1)
(3:24-cv-00694-RJC)

UNITED STATES OF AMERICA

Plaintiff - Appellee

v.

JAMIE BLUNDER

Defendant - Appellant

ORDER

Upon consideration of submissions relative to the motion to recall the mandate and amend the motion for petition for rehearing and rehearing en banc, the court denies these motions.

For the Court--By Direction

/s/ Nwamaka Anowi, Clerk

EXHIBIT
M

Benz of South Charlotte. Your Affiant believes that this was most likely a "loaner" vehicle provided by Mercedes Benz to BLUNDER as BLUNDER's Mercedes Benz was not observed at BLUNDER's residence at that time.

26. BLUNDER then drove the SUV from his residence to the Red Lot at CLT. BLUNDER was observed sitting in the SUV in the Red Lot talking on a mobile phone. Approximately 15 minutes later BLUNDER got out of his car and met up with an individual that got out of the black Chevy Tahoe registered to TUCKER. This individual is believed to be TUCKER.

27. BLUNDER and TUCKER then walked away from the Red Lot in the direction of the main CLT terminal, their place of employment.

28. Subsequently on April 1, 2016, a Charlotte Mecklenburg Police Department K9 drug detection dog was used in the Red Lot to sniff multiple cars to include the SUV driven by BLUNDER and the black Chevy Tahoe driven by TUCKER.

29. The K9 alerted to the scent of narcotics emanating from both the SUV driven by BLUNDER as well as the black Chevy Tahoe driven by TUCKER. These were the only two vehicles that resulted in a drug alert by the K9 of the numerous vehicles checked.

30. Based on my training and experience, and BLUNDER's previously noted use of his TSA badge to mitigate law enforcement detection, I believe these specific observations further indicate that BLUNDER is utilizing his position as a TSA Officer at the Charlotte Douglas Airport to facilitate his illegal drug distribution activity.

31. On April 5, 2016 BLUNDER was observed driving SUBJECT VEHICLE away from his residence towards the Greensboro, NC area. BLUNDER was observed going into and

EXHIBIT
N

PROBABLE CAUSE

Background

15. On December 9, 2015 JAMIE BLUNDER was pulled over by a North Carolina State Highway Patrol (NCSHP) Trooper for speeding. When approached by the NCSHP Trooper during the stop, BLUNDER presented the trooper with a TSA "badge."

16. During the stop the trooper proceeded to ask BLUNDER for his driver's license, and instead BLUNDER presented a Homeland Security Identification Card. The Trooper indicated that it appeared that BLUNDER was attempting to present law enforcement credentials in order to avoid receiving a speeding ticket.

17. A corresponding internet search revealed that BLUNDER had been charged in 2008 with felony cocaine charges stemming from a "Terry stop" during which distribution quantities of cocaine were found on the person of BLUNDER.

18. Records checks indicated that BLUNDER's 2008 cocaine charges were dismissed because the evidence against him showing his possession of cocaine was suppressed.

19. Through contact with the Federal Air Marshal Service it has been learned that BLUNDER is currently a Transportation Safety Officer working in the Charlotte Douglas Airport Terminal (CLT). A review of BLUNDER's application revealed that BLUNDER did not properly disclose the nature and details surrounding the cocaine arrest incident as were required in the application.

20. Also through contact with the Federal Air Marshal Service it was learned that BLUNDER had provided TSA with telephone number (336) 451-4443 (the TARGET TELEPHONE) as his mobile telephone contact number. As previously detailed, AT&T Mobility

EXHIBIT O

SHEIN, BRANDENBURG & SCHROPE
FEDERAL CRIMINAL LAW CENTER
HELPING YOU SUCCESSFULLY NAVIGATE THE CRIMINAL JUSTICE SYSTEM

May 20, 2024

Jamie Blunder, Reg. No. 33204-058
FCI ELKTON
FEDERAL CORRECTIONAL INSTITUTION
P.O. BOX 10
LISBON, OH 44432

Dear Mr. Blunder,

Unfortunately, the Fourth Circuit declined our request for permission to file a successive 28 U.S.C. § 2255 (enclosed herewith). While, as we discussed, we knew that this was an uphill battle, and that these requests are rarely granted, we believed that you had a valid basis for making the request and made a strong showing that the Government was deliberately misleading (or dishonest) in the warrant applications. Pursuant to Fourth Circuit Local Rule 22(d) "No motion or request for reconsideration, petition for rehearing, or any other paper seeking review of the granting or denial of authorization [to file a second or successive § 2255] will be allowed."

We will set up a call with you next week to discuss the foregoing.

Sincerely,

Leigh S. Schrope
Attorney at Law

Enclosure

[EXHIBIT P1]

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Local Rule 22(d). Motions for Authorization

Any individual seeking to file in the district court a second or successive application for relief pursuant to 28 U.S.C. § 2254 or § 2255 shall first file a motion with the Court of Appeals for authorization as required by 28 U.S.C. § 2244, on the form provided by the clerk for such motions. The motion shall be entitled "In re _____, Movant." The motion must be accompanied by copies of the § 2254 or § 2255 application which movant seeks authorization to file in the district court, as well as all prior § 22S4 or § 2255 applications challenging the same conviction and sentence, all court opinions and orders disposing of those applications, and all magistrate judge's reports and recommendations issued on those applications. The movant shall serve a copy of the motion with attachments on the respondent named in the proposed application and shall file the original motion with attachments in the Court of Appeals. Failure to provide the requisite information and attachments may result in denial of the motion for authorization.

If the Court requires a response to the motion, it will direct that the response be received by the clerk for filing within no more than seven days. The Court will enter an order granting or denying authorization within 30 days of filing of the motion, and the clerk will transmit a copy of the order to the district court. If authorization is granted, a copy of the application will be attached to the order for filing in the district court. No motion or request for reconsideration, petition for rehearing, or any other paper seeking review of the granting or denial of authorization will be allowed.

HISTORY: Amended Dec. 1, 2002; Dec. 1, 2009; July 2, 2012.

[EXHIBIT P2]

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Additional material from this filing is available in the Clerk's Office.