

THE STATE OF TEXAS §

COUNTY OF HARRIS §

AFFIDAVIT FOR SEARCH WARRANT

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED THE AFFIANT HEREIN, A PEACE OFFICER UNDER THE LAWS OF TEXAS, WHO, BEING DULY SWORN, ON OATH MADE THE FOLLOWING STATEMENTS:

My name is TED WILSON and I am commissioned as a peace officer by the TEXAS ATTORNEY GENERAL'S OFFICE.

1. There is in the City of Houston, Harris County, Texas, a suspected place and premises described and located as follows:

65 Terry Hall Lane. It is a two- story, brown wood townhouse within a townhouse community known as Watkins Glenn Townhomes. Terry Lane is a street that runs off of Evergreen Blvd. It is the entry into Watkins Glenn. You go south on Terry Hall for about ¼ mile and you come to a stop sign. You turn right (west) at the stop sign, which is still Terry Hall Lane, and go about 100 yards. You turn left (south) and on the right hand side is a large two-story wooden structure with multiple dwellings. There are four townhouse units facing the street, which is still named Terry Hall Lane. #65 is the last unit on the north end of the building. The front door as copper numbers 65 affixed to it. It is located within the city of Houston, and within Harris County, Texas.

The suspected place includes the entire premises and curtilage at that location, if a residence, including all outbuildings, sheds, and vehicles found to be under the control of the persons described below in which evidence sought under this warrant could reasonably be hidden.

2. The suspected place is in control of each of the following person or persons:

Robert Hammonds, a white male, DOB: 3/19/52.

3. It is the belief of affiant that at the above described premises is the following property or items:

Property the possession of which is prohibited by law, namely, images of child pornography, either printed or digitally stored on the hard drives of computers, external hard drives, other external storage devices including, but not limited to CD's, DVD's, external hard drives, thumb drives, floppy disks, Zip drives, and memory cards including SCANDISK and COMPACT Flash Cards, cellular telephones and digital cameras. Also, instruments used in the commission of the offense of possession of child pornography namely, any cameras, digital or film type, and any memory cards for said cameras.

4. Affiant has probable cause for said belief by reason of the following facts and circumstances:

On Monday, July 4, 2016, I personally met with a woman and her daughter in my office. The woman, who I will not identify within this affidavit in order to protect the identity of the daughter from persons who may read the contents of this affidavit, told me that her daughter, who is under the age of 15, had been at 65 Terry Hall Lane on several occasions within the past six weeks. The mother told me that her daughter had been acting strange and that she talked with her daughter last night and she told her mother that the man who lived in the house had shown her pictures on his computer and the description of the pictures were of young, pre-pubescent girls naked with grown men who were also naked. The mother told me that the man was Robert Hammonds.

I then spoke with the daughter. She told me that she knew Hammonds as “Bob”. She said that her mother dropped her off at Bob’s on several occasions when her mother had to work and there would be no one to look after her. She said that Bob started showing her pictures on his computer. She described them to me as pictures of young pre-pubescent girls with adult men. She said the men and the girls were naked and that they were touching each other on their private parts. She then told me that when Bob would show her those pictures he would take his clothes off and took her clothes off too. She said that he had her touch his penis and rub it. She did not tell me that he had sexual intercourse with her but that he would only have sexual contact. She then told me that Bob had a camera and that he took some pictures of her when she was naked and then loaded them on to his computer and showed them to her. She also said that Bob told her that if she ever told anyone about this that he would kill her and that is why she waited several weeks to tell her mother. I asked her when was the last time she saw any pictures like those on his computer and she told me that it had been over three weeks from the making of this affidavit.

I checked the records of the Texas Department of Public Safety and they confirm that the mother has no criminal record. I have also determined that she is gainfully employed. I have also confirmed that the daughter is a student in a local middle school in Harris County and is in good standing at that school.

I checked the records of the Texas Department of Public Safety and they show that Robert Hammonds, who lives at 65 Terry Hall Lane is a white male, DOB: 3/19/52. I drove by 65 Terry Hall Lane. It is a two- story, brown wood townhouse within a townhouse community known as Watkins Glenn Townhomes. Terry Lane is a street that runs off of Evergreen Blvd. It is the entry into Watkins Glenn. You go south on Terry Hall for about ¼ mile and you come to a stop sign. You turn right (west) at the stop sign, which is still Terry Hall Lane, and go about 100 yards. You turn left (south) and on the right hand side is a large two-story wooden structure with multiple dwellings. There are four townhouse units facing the street, which is still named Terry Hall Lane. #65 is the last unit on the north end of the building. The front door as copper numbers 65 affixed to it. It is located within the city of Houston, and within Harris County, Texas.

I also checked the business records of COMCAST, which provides the Internet service to 65 Terry Hall Lane. The records show that the Internet service is billed to Robert Hammond at that address and is still in service.

I am an investigator with the Criminal Law Enforcement Division of the Texas Attorney General's Office. I have been a peace officer for the past fourteen years and worked as an investigator with the Attorney General's Office for the past six years. For the past four years I have been assigned to the investigation of child predators and child pornography. During my four years in this assignment, I have worked on over one hundred investigations involving the possession, the production, and the sharing of child pornography. In addition, I have received specialized training from the Federal Bureau of Investigation in the investigation of individuals who prey on underage children for the purpose of sex as well as those who make, keep, and share child pornography. I have learned from my training and experience that persons who possess child pornography will keep those images for long periods of time. Often, they will keep the images for years. I have participated in investigations where search warrants were executed to seize computers containing child pornography and we have found images that have been on the computer or on external digital storage devices for more than a year. These images are kept on the hard drives of computers, external hard drives, other external storage devices including, but not limited to CD's, DVD's, external hard drives, thumb drives, floppy disks, Zip drives, and memory cards including SCANDISK and COMPACT Flash Cards. I have also found images on the person's cellular telephones and on digital cameras that they possess.

Wherefore, affiant asks for issuance of a warrant that will authorize him and other officers to search said suspected place and premises and to seize and search each suspected party named and described herein and others unknown to affiant found to be occupants of and in control of said premises for the property described above and seize same.

Affiant

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT ON THIS
THE ____ DAY OF JULY, 2016.

Judge _____
_____ Court
Harris County, Texas