

THE STATE OF TEXAS
COUNTY OF WILBARGER

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WARRANT # J121FE 0029
CASE # 210588

COMPLAINT FOR ARREST 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 AND ACCUSATIONS:

My name is [REDACTED] and I am commissioned as a peace officer by the **City of Vernon Police Department, 46th Judicial District**. I am the Affiant of this affidavit. I have been a law enforcement officer for over 15 years and employed as a Criminal Investigator for over 13 years with the Vernon Police Department. I currently hold an Advanced Peace Officer Certificate through the Texas Commission on Law Enforcement Officer Standards and Education. I have received educational and field training in the investigations of crimes against persons to include: Techniques for Investigating Violent Crimes from Lone Star Forensic Associates and specialized class room and hands-on training from the Public Agency Training Council to include Investigative Techniques Using Social Networking Sites as well as Specialized Training from the Texas Rangers in Advanced Crime Scene Investigations through Amarillo College Criminal Justice Program. I have investigated numerous cases involving crimes against persons to include: **Child Endangerment**.

I hereby state upon my oath that I have reason to believe and do believe that heretofore, and before the making and filing of this Complaint, that

Pounds, Brian Keith
W/M, DOB: [REDACTED] 6'02", 300lbs, Bro/Blu.
[REDACTED]

On or about the **1st day July, 2021**, in **Wilbarger**, Texas, did then and there commit the offense of **Sexual Assault** by intentionally or knowingly have sexual intercourse [REDACTED] with a **15 year old female child (pseudonym: Jane Doe)**, in violation of **Penal Code 22.021 (a) (1) , Felony 2 Offense**, against the laws of the state.

My probable cause for said belief and accusation is as follows: **Affiant has read a report filed by Officer [REDACTED] on 07/01/2021, in reference to a 15 year old female, reporting she had sexual intercourse with a 45 year old male, identified as Brian Keith Pounds, at [REDACTED] in Vernon. The 15 year old female was given the pseudonym: Jane Doe. The 15 year old female juvenile will be called Jane Doe throughout this affidavit. [REDACTED] has personally read [REDACTED] report, [REDACTED] supplement and reviewed Officer's PVU evidence in this case. [REDACTED] has personally reviewed a Patsy's House interview of Jane Doe in reference to this case.**

On 07/01/2021, Officer [REDACTED] was notified by Jane Doe's mother, that she was attempting to locate Jane Doe at the [REDACTED]. While at the [REDACTED] located at 3110 US Hwy 287, [REDACTED] made contact with defendant Brian Pounds. Pounds told [REDACTED] is the Minister of the First Assembly of God

and was there trying to get a room for a person that was in need. Pounds had rented [REDACTED] in the name of the First Assembly of God Church. At that time [REDACTED] did not know Pounds had been in the room with Jane Doe.

On this same date, Jane Doe's mother found Jane Doe at Walmart, located in the 3800 block of US Hwy 287, just a little farther north of the [REDACTED]. Jane Doe was brought to the Vernon Police Dept. by her mother. During an interview of the 15 year old female, Jane Doe told Officers that she had been having sexual intercourse with Pounds at the [REDACTED] [REDACTED]. Jane Doe said she had also been smoking methamphetamine while at the motel room. Jane Doe said the sexual intercourse happened around noon. Jane Doe said she had been having sexual intercourse with Pounds for about a month. Jane Doe said Pounds had been initially counseling her and her family through the church.

Officer [REDACTED] was sent to the [REDACTED] to secure [REDACTED], until investigators could get permission to search the room for physical evidence. On this same date, (07/01/21), I personally talked to Brian Pounds at the Vernon Police Dept. I told Pounds that an allegation had been made and Pounds denied any sexual contact between him and Jane Doe. Pounds admitted he knew the family and he as the minister of the church had been helping the family and Jane Doe. Pounds signed a Consent to Search Form and allowed investigators to search [REDACTED] at the [REDACTED] that was registered under his name and the First Assembly of God Church.

I went to the [REDACTED] and conducted a search of [REDACTED] while [REDACTED] [REDACTED] made arrangements to get a [REDACTED] Exam done on Jane Doe. I found physical evidence to include, suspected methamphetamine, fibers and hairs that led me to believe Jane Doe was in [REDACTED]

Jane Doe was taken to United Regional Health Care in Wichita Falls for a [REDACTED] Exam. Jane Doe was admitted to the hospital with medical complications from smoking methamphetamine. Medical Records will show Jane Doe tested positive for methamphetamine in her system.

On 07/06/21 I personally observed a Forensic Interview of Jane Doe at Patsy's House in Wichita Falls Texas. [REDACTED] (Forensic Interviewer) conducted the interview. During the Forensic Interview, Jane Doe gave the following details about having sexual intercourse with Brian Pounds over the course of the last month.

Pounds began the grooming process by getting Jane Doe a job cleaning houses for elderly people. Pounds then began to meet Jane Doe at his Church located at 2430 Sand Road, in Vernon. Pounds started offering Jane Doe methamphetamine at the church. Pounds continued to meet with Jane Doe at the church for what Jane Doe described as counseling. Jane Doe said Pounds would offer her methamphetamine while at the church.

Jane Doe described the first sexual encounter that happened in the church. [REDACTED]

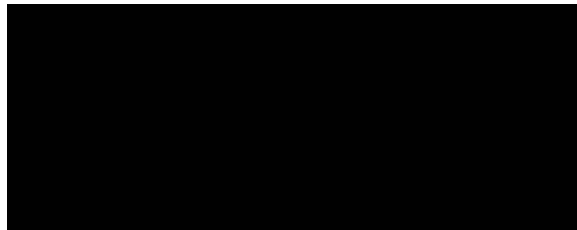
Jane described the second sexual encounter that happened at the church. [REDACTED]

[REDACTED] Jane Doe said on July 1st, 2021 when they (her and Pounds) got caught at the [REDACTED], was when she told her mother and [REDACTED]

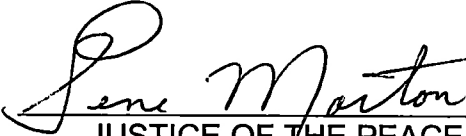
[REDACTED] Jane Doe said Pounds picked her up and took her to the [REDACTED] [REDACTED] Jane Doe said Pounds gave her methamphetamine to smoke and get high. Jane Doe said Pounds had sex with her [REDACTED] at the [REDACTED] Jane Doe said during the course of having sexual intercourse, Pounds placed both hands on her neck and choked her. [REDACTED]

Based on the events described by Jane Doe and the visual and physical evidence collected in [REDACTED] at the [REDACTED] Affiant has probable cause to believe Brian Pounds did groom 15 year old, Jane Doe to a point where Pounds was able to make Jane Doe have sexual intercourse while furnishing Jane Doe illegal narcotics to help carry out the scheme.

Therefore, [REDACTED] believes probable cause exists to believe that **Brian Pounds** committed the offense of **Sexual Assault**, by knowingly and intentionally have sexual intercourse with Jane Doe, a 15 year old juvenile at the time, against the laws of this State. Accordingly, [REDACTED] request for the issuance of a warrant authorizing the arrest of **Brian Pounds** for the **Felony 2 Offense of Sexual Assault**.



SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT/COMPLAINANT ON THIS THE 7TH DAY OF JULY, 2021.


JUSTICE OF THE PEACE
WILBARGER COUNTY, TEXAS

