

THE STATE OF TEXAS

§

§

SEARCH WARRANT

COUNTY OF HARRIS

§

TO THE SHERIFF OR ANY PEACE OFFICER OF HARRIS COUNTY TEXAS

GREETINGS:

WHEREAS, Complaint in writing, under oath, has been made before me by **Deputy Investigator Jose Pulido**, a peace officer employed by the Harris County Sheriff's Office, and who is currently assigned to the **Proactive Internal Affairs Division** with an address of 5749 South Loop East Houston, Texas 77033, Harris County, Texas, which complaint is attached hereto and expressly made a part hereof for all purposes and said complaint having stated facts and information in my opinion sufficient to establish probable cause for the issuance of this warrant;

YOU ARE THEREFORE COMMANDED to forthwith search the place therein named, to wit: one cellular telephone, more specifically described as the following:

An Apple iPhone Light Purple in color IPHONE 11, Serial No. C8PCFA8LN72N, IMEI 352893110184790,

Brianna Scott:



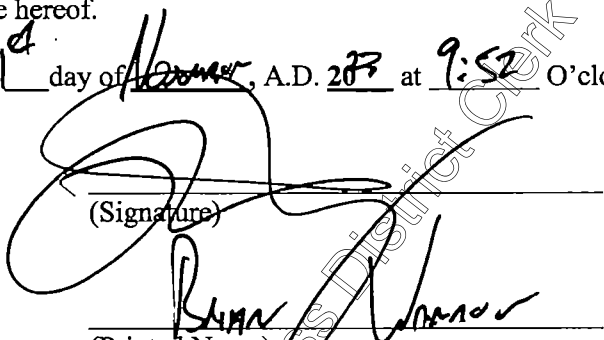
that is currently located in the Harris County District Attorney's Office Digital Forensics' Unit (DFI), with the authority to search for and to seize any and all evidence that may be found therein, including but not limited to: photographs/video, text or multimedia messages (SMS and MMS); any call history or calls logs; any emails, instant messaging, or other forms of communication of which said phones are capable; internet browsing history; any stored Global Positioning System (GPS) data; contact information including email addresses, physical addresses, mailing addresses, and phone numbers; any voicemail messages contained on said phones; any recordings contained on said phones; any social media posts or messaging, and any images associated thereto, including but not limited to that on Facebook, Twitter, and Instagram; any documents and/or evidence showing the identity of ownership and identity of the users of said described item(s); computer files or fragments of files; all tracking data and way points; CD-ROM's, CD's, DVD's, thumb drives, SD Cards, flash drives or any other equipment attached or embedded in the above described devices that can be used to store electronic data, metadata and temporary files. The information on this

cellular phone may or may not contain information and evidence pertinent to the furtherance of drug introduction in the Harris County Jails.

YOU ARE FURTHER ORDERED to have a forensic examination conducted of any devices seized pursuant to this warrant to search for the item previously listed.

HEREIN FAIL NOT and due return make hereof.

WITNESS MY SIGNATURE on this the 1st day of November, A.D. 2023 at 9:52 O'clock, A.M.



(Signature)

(Printed Name)

MAGISTRATE
JUDGE 2023 District Court
Harris County, Texas

FILED

Marilyn Burgess
District Clerk

NOV 03 2023

Time: _____
Harris County, Texas

By _____
Deputy

Unofficial Copy Office of Marilyn Burgess District Clerk

1071453

THE STATE OF TEXAS

§

AFFIDAVIT FOR

§

SEARCH WARRANT

COUNTY OF HARRIS

§

I, **Deputy Investigator Jose Pulido**, a peace officer employed by the **Harris County Sheriff's Office** and who is currently assigned to the **Proactive Internal Affairs Division**, do solemnly swear that I have reason to believe and do believe that within the following cellular phone:

An Apple iPhone Light Purple in color IPHONE 11, Serial No. C8PCFA8LN72N, IMEI 352893110184790,

Brianna Scott:



Which is currently located in the custody of the Harris County District Attorney's Office Digital Forensics' Unit (DFI), contain potential evidence, including but not limited to: photographs/video; text or multimedia messages (SMS and MMS); any call history or calls logs; any emails, instant messaging, or other forms of communication of which said phones are capable; internet browsing history; any stored Global Positioning System (GPS) data; contact information including email addresses, physical addresses, mailing addresses, and phone numbers; any voicemail messages contained on said phones; any recordings contained on said phones; any social media posts or messaging, and any images associated thereto, including but not limited to that on Facebook, Twitter, and Instagram; any documents and/or evidence showing the identity of ownership and identity of the users of said described item(s); computer files or fragments of files; all tracking data and way points; CD-ROM's, CD's, DVD's, thumb drives, SD Cards, flash drives or any other equipment attached or embedded in the above described devices that can be used to store electronic data, metadata and temporary files. The information on this cellular phone may or may not contain information and evidence pertinent to the furtherance of drug introduction in the Harris County Jails.

MY BELIEF IS BASED UPON THE FOLLOWING FACTS:

Your affiant, Deputy Jose Pulido, with the Harris County Sheriff's Office (HCSO) Internal Affairs Division, has been with the HCSO for over 12 years and has received specialized training in narcotics and controlled substances kept or prepared in violation of the laws of this state and property or paraphernalia specifically designed, made, or adapted for or commonly used in the commission of an offense of the laws of this state. Your Affiant, while conducting a separate ongoing investigation, received notification on September 1, 2023, via SECURUS, an audio recording system

1071053

designed to record calls made by inmates at the Harris County Jails, of an inmate by the name of Louis Santee SPN 02899605, who Affiant has identified by name and sight and who Affiant recognizes the voice of through listening to jail calls, placing a call to a former inmate at the Harris County, 1200 Baker Street Jail, who will be sited hereinafter as Approved Confidential Informant (ACI). Your affiant verified through jail records that while incarcerated at the 1200 Baker Street Harris County Jail, ACI and Santee were housed in the same cell block, which Affiant knows through training and experience would have provided an opportunity for these two individuals to meet. Affiant has listened to multiple recorded calls between Santee and ACI and was able to determine that ACI was helping facilitate the introduction of sheets of paper laced with unknown controlled substances into the jails, which were being delivered to Inmate Santee and others. Your affiant searched law enforcement databases and found that ACI was actively placed on parole. Your affiant contacted Deputy Director of Field Operations Amanda Lowe, who confirmed that ACI was under their supervision as a parolee. Your affiant asked Mona Pena, Regional 3 Director, to contact ACI and have him report to 3322 Richmond Ave., Houston, TX 77092, on October 3, 2023.

Your affiant met with ACI on October 3, 2023, and provided ACI with the opportunity to discuss ACI's involvement in facilitating the introduction of contraband into the Harris County Jails. ACI did not elaborate on his personal involvement in facilitating contraband; however, ACI advised the main source of the delivery was the attorneys of various inmates. ACI stated that during client/attorney visitation, attorneys would commonly pass sheets of paper to their clients in the attorney/client booth. ACI advised the attorneys generally received the laced sheets from some third party outside of the jail, often a friend or significant other, and attorneys would then frequently pass the sheets of paper along to their clients at the attorney/client visits. Affiant questioned ACI about what type of sheets were being ordered and what ACI was supposed to provide, and ACI stated a specific type of controlled substance was not ordered. ACI stated to Affiant that based on ACI's experience, when laced sheets of paper, which Affiant knows through training and experience are commonly referred to as "Sheets" or "Dominos," are introduced into the Harris County Jail, the inmates who are receiving the sheets do not know what controlled substance is on the sheet. ACI stated to Affiant "It's just laced with something to get them high."

ACI advised inmates are paying up to \$3,000 per sheet, depending on what it was laced with. ACI stated that ACI had one prior dealing with a female by the name of Brianna Scott, a black female born December 9, 1995, involving a hand-to-hand exchange of sheets of paper laced with contraband. ACI stated during this transaction, ACI learned from Brianna these sheets were to be delivered from Brianna to Attorney Taylor Thames, a black female, date of birth May 28, 1996. ACI stated that on this occasion, it was ACI's understanding that Attorney Thames would then visit Inmate D'onta Allen, SPN 02872895, at the 701 North San Jacinto Harris County Jail and pass the laced sheets to Inmate Allen through a small opening in the attorney-client booth.

ACI agreed to cooperate to assist in ongoing investigations regarding contraband in the Harris County Jails. ACI stated that before meeting with Affiant about the ACI's cooperation with ongoing investigations, Brianna Scott had contacted ACI about getting another order of sheets for Inmate Allen. Based on this contact, ACI was directed by your affiant when and where to meet up with Brianna to facilitate this delivery.

In preparation for the sting operation, your Affiant, along with Harris County District Attorney's Office Investigator Arturo Marines, whom Affiant knows to be a certified peace officer in the State of Texas, met with Sergeant Sean Simpson, whom Affiant knows to be a certified peace officer in the State of Texas, at the Harris County Sheriff's Office Crime Scene Unit, located at 601 Lockwood Houston, TX 77011, on October 13, 2023. Affiant observed that HCDA Investigator A. Marines, at the direction of Sergeant Simpson, assisted by placing his palm print in the center of all 40 sheets of blank white paper that would constitute the items to be delivered to Scott and then Allen. The papers were also numbered individually with an ultraviolet pen in the bottom right-hand corner of each page. These pre-marked sheets were placed in an envelope and will be utilized for the controlled delivery to Scott.

On October 14, 2023, your affiant listened to live SECURUS phone calls from Inmate Allen to Scott. Scott was at a dealership where she spoke with car salesmen and expressed her interest in trading in her vehicle. Scott described her vehicle as a 2016 White Jeep Grand Cherokee, Overland, with a sunroof. A search of multiple law enforcement

databases revealed Scott drove a White Jeep Grand Cherokee bearing Texas license plate MPV2624.

On Sunday, October 15, 2023, undercover units drove past Scott's residence at 2106 Peachwood Drive, Missouri City, TX 77489. They observed her White Jeep Grand Cherokee parked in the roadway in front of a residence.

On Monday, October 16, 2023, Affiant met with ACI in the Home Depot parking lot at 14440 Hillcroft Street. ACI was briefed on their role to introduce the undercover deputy to Scott. The Harris County Sheriff's Office currently employs the UC. UC has 3 years of experience as an undercover deputy and has received specialty training in undercover operations. Additionally, he has been with the Harris County Sheriff's Office for 4.5 years and has been with law enforcement for 14 years.

At approximately 11:15 a.m., your affiant observed a white Jeep Grand Cherokee, license plate: MPV 2624, arrive at the Home Depot parking lot. Your affiant knew this to be the vehicle belonging to Scott based on prior research. Your affiant observed a black female exit the vehicle. Your affiant knew this female to be Brianna Scott based on previous intelligence. Affiant observed as Scott exited her vehicle and entered the undercover vehicle. Scott sat in the front passenger seat and conversed with the UC. UC stated he had 30 sheets at \$250 per sheet. Scott agreed to the amount of payment for the 30 sheets. Scott stated that she doesn't send anything to the jail anymore, no more photos or letters, and that she gives everything to the attorney. Scott asked if she needed to lay the papers flat because once the papers were "too puffy" so she put her dresser on the envelope to make sure it was "real flat." Based on training and experience, your affiant took this statement to mean that Scott has not only had prior dealings with laced papers but also had knowledge that these papers she received from the undercover deputy were laced.

Based on prior dealings with Scott, ACI stated that ACI would get sheets of paper to Scott with the understanding that they were laced with a controlled substance; however, the specific type of substance was never agreed upon. ACI stated that Scott would request ACI to "make sure they are strong" or "make sure they are g.a.s." (good ass shit). Scott remained in the undercover vehicle for approximately 13 minutes with the undercover deputy. Before Scott left, the undercover handed an envelope to Scott with the 30 pre-marked papers inside, and the two exchanged phone numbers.

Throughout this investigation, your affiant has continuously listened to the SECURUS calls between Inmate Allen and Brianna Scott. In those conversations, it is apparent that Scott is the main source of communication between Inmate Allen and his attorney, Taylor Thames. Scott routinely exchanges cell phone texts and calls with attorney Thames on behalf of Inmate Allen. Specifically, on October 9, 2023, at 09:00, Inmate Allen called 832-590-9263, which, according to a TLO Law Enforcement Database search, belongs to Brianna Scott. In that call, Scott told Inmate Allen she would text his attorney so she could "drop it off in the morning." Inmate Allen placed another call to Scott the following day. Roughly 4 minutes into the conversation, Scott told Allen, "Your lawyer did not text me back till late and I was already asleep. She (Thames) texted me this morning and said I still could have brought it." On October 16, 2023, Inmate Allen called Scott, who stated that his attorney called her. According to Scott, Inmate Allen's attorney wanted him to "move snail-like, and it was nothing to worry about." Scott told Inmate Allen she texted his attorney and asked if she would see him (Inmate Allen) before Thursday so she (Scott) could give her the stuff. Scott told the attorney just to let her know because she reprinted Inmate Allen's pictures due to him not receiving them. According to Scott, his attorney called and asked why he did not receive them. Scott told the attorney they were taken, and she (the attorney) asked why. Scott advised that she (Scott) could not give her (Thames) an answer. Scott said the attorney questioned why everything was taken from him. Scott told Inmate Allen the attorney said she wondered if they were watching Inmate Allen because there have never been issues in the past. Scott told Inmate Allen his attorney told him to "chill." On October 23, 2023, at 16:50 hours, Inmate Allen called Scott, who stated, roughly 12 minutes into the conversation, that Allen's attorney texted her and said, "Hey, not yet".

Based on the voluminous amount of cell phone communication between Brianna Scott and Attorney Taylor Thames, your Affiant has reason to believe and does believe that the cell phone listed in this warrant to be searched, which belongs to Brianna Scott, contains therein phone numbers, text messages, emails, call history, call logs of incoming and outgoing calls, which would show communication between Brianna Scott and Attorney Taylor Thames that would

1071053

be indicative of Attorney Taylor Thames conspiring to deliver a controlled substances to Inmate D'onta Allen at the Harris County Jail.

WHEREFORE, PREMISES CONSIDERED, your Affiant respectfully requests that a warrant issue authorizing your Affiant, or any other peace officer of Harris County, Texas to search the following cellular phones:

An Apple iPhone Light Purple in color IPHONE 11, Serial No. C8PCFA8LN72N, IMEI 352893110184790,

Brianna Scott:



Which is located in the custody of the Harris County District Attorney's Office Digital Forensics' Unit (DFI), including but not limited to: photographs/video; text or multimedia messages (SMS and MMS); any call history or calls logs; any emails, instant messaging, or other forms of communication of which said phones are capable; internet browsing history; any stored Global Positioning System (GPS) data; contact information including email addresses, physical addresses, mailing addresses, and phone numbers; any voicemail messages contained on said phones; any recordings contained on said phones; any social media posts or messaging, and any images associated thereto, including but not limited to that on Facebook, Twitter, and Instagram; any documents and/or evidence showing the identity of ownership and identity of the users of said described item(s); computer files or fragments of files; all tracking data and way points; CD-ROMs, CD's, DVD's, thumb drives, SD Cards, flash drives or any other equipment attached or embedded in the above described devices that can be used to store electronic data, metadata and temporary files.

Unofficial Copy of Office of Marilyn Burgess District Clerk

[Signature]
AFFIANT #1830

Sworn to and Subscribed before me on this the 1st of November, 2023, A.D.

FILED
Marilyn Burgess
District Clerk
NOV 03 2023

[Signature]
MAGISTRATE
JUDGE, [Signature] District Court
Harris County, Texas

Time: _____
Harris County, Texas
By _____
Deputy

1071653

THE STATE OF TEXAS

§

RETURN AND INVENTORY

COUNTY OF HARRIS

§

The undersigned, being a peace officer under the laws of the State of Texas, certifies that the foregoing warrant came to hand on the day it was issued and that it was executed on the 1st day of Nov A.D. 2023, by making the search directed therein and seizing during the search the following described property:

- Digital Data from Communication Device
- IMEI 352893110184790

Unofficial Copy Office of Marilyn Burgess District Clerk

 11/03/2023

OFFICER EXECUTING PROCESS

107653