

THE STATE OF TEXAS
VS.

LEON PHILIP JACOB

01651455

SPN:
DOB: WM 5/26/1977
DATE PREPARED: 2/16/2017

D.A. LOG NUMBER: 2331451
CJIS TRACKING NO.:
BY: EV DA NO: 0027652
AGENCY: HPD
O/R NO: 016493517
ARREST DATE: TO BE

NCIC CODE: 5309 04 3rd

RELATED CASES:

FELONY CHARGE: Stalking

CAUSE NO:

HARRIS COUNTY DISTRICT COURT NO:

FIRST SETTING DATE:

1541114
184

BAIL: \$NO BOND
PRIOR CAUSE NO:

FILED
Chris Daniel
District Clerk

FEB 16 2017

Time: 14:00

By: [Signature]
Deputy

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **LEON PHILIP JACOB** hereafter styled the Defendant, heretofore on or about **JANUARY 23, 2017 CONTINUING THROUGH FEBRUARY 11, 2017**, did then and there unlawfully FROM ON OR ABOUT JANUARY 23, 2017 THROUGH ON OR ABOUT FEBRUARY 11, 2017, and pursuant to the same scheme and course of conduct directed specifically at [REDACTED], hereinafter called the Complainant, did knowingly engage in conduct that the Defendant knew and reasonably believed that the Complainant would regard as threatening the **INFLECTION OF BODILY INJURY UPON THE COMPLAINANT**, namely, **BY HIDING AND WAITING OUTSIDE OF COMPLAINANT'S WORKPLACE AT [REDACTED], HARRIS COUNTY, TEXAS** and said conduct would cause a reasonable person to fear, and did cause **THE COMPLAINANT** to **FEAR THE INFLECTION OF BODILY UPON THE COMPLAINANT, FEEL HARASSED, FEEL ANNOYED AND FEEL ALARMED.**

It is further presented that in Harris County, Texas, **LEON PHILIP JACOB**, hereafter styled the Defendant, heretofore on or about **FEBRUARY 6, 2017**, did then and there unlawfully FROM ON OR ABOUT JANUARY 23, 2017 THROUGH ON OR ABOUT FEBRUARY 11, 2017, and pursuant to the same scheme and course of conduct directed specifically at [REDACTED], hereinafter called the Complainant, did knowingly engage in conduct that the Defendant knew and reasonably believed that the Complainant would regard as threatening the **INFLECTION OF BODILY INJURY UPON THE COMPLAINANT**, namely, **BY FOLLOWING THE COMPLAINANT IN HIS VEHICLE** and said conduct would cause a reasonable person to fear, and did cause **THE COMPLAINANT** to **FEAR THE INFLECTION OF BODILY UPON THE COMPLAINANT, FEEL HARASSED, FEEL ANNOYED AND FEEL ALARMED.**

It is further presented that in Harris County, Texas, **LEON PHILIP JACOB**, hereafter styled the Defendant, heretofore on or about **FEBRUARY 6, 2017**, did then and there unlawfully FROM ON OR ABOUT JANUARY 23, 2017 THROUGH ON OR ABOUT FEBRUARY 11, 2017, and pursuant to the same scheme and course of conduct directed specifically at [REDACTED], hereinafter called the Complainant, did knowingly engage in conduct that the Defendant knew and reasonably believed that the Complainant would regard as threatening the **INFLECTION OF BODILY INJURY UPON THE COMPLAINANT**, namely, **BY REPEATEDLY SENDING COMPLAINANT EMAIL MESSAGES** and said conduct would cause a reasonable person to fear, and did cause **THE COMPLAINANT** to **FEAR THE INFLECTION OF BODILY UPON THE COMPLAINANT, FEEL HARASSED, FEEL ANNOYED AND FEEL ALARMED.**

PROBABLE CAUSE

Affiant, Carlton Jack, is a certified peace officer employed with the Houston Police Department as an investigator in the Special Victims Division. Affiant has reason to believe and does believe that Leon Phillip Jacob, hereafter styled the defendant, committed the Felony offense of Stalking in Harris County, Texas from on or about January 23, 2017 through on or about February 11, 2017. Affiant bases his belief on the following facts:

Your affiant has spoken to the complainant, [REDACTED], a credible and reliable person, who told affiant that beginning on or about January 12, 2017 and on other occasions continuing through February 11, 2017, the defendant, Leon Philip Leon, whom she knows by name and sight as her ex-boyfriend, has called her place of employment and has gone to her place of employment at [REDACTED] in Harris County, Texas. The complainant is afraid of the defendant and afraid that he will hurt her again.

RECORDER'S MEMORANDUM
This instrument is of poor quality
at the time of imaging

On or about January 12, 2017, the defendant assaulted complainant causing her pain and injury.

On or about January 23, 2017, the defendant parked outside the complainant's place of employment located at [REDACTED] Houston, Harris County, Texas and began following complainant's vehicle when she exited the parking lot. Defendant drove his vehicle in front complainant's vehicle on Leeland Street using his vehicle to block hers, exiting his vehicle yelling "You are throwing away the best thing you ever had! I just want to talk to you!" Complainant drove off when defendant continued following her to the Houston Police Department located at 1200 Travis Street.

On or about January 24, 2017, defendant sent a female by the name of Laura into complainant's place of employment to negotiate, Officer Hill contacted defendant and advised him to stay away from complainant, and he stated he would.

On or about January 26, 2017, I interviewed defendant via the telephone regarding assaulting complainant on January 12, 2017 wherein defendant admitted to placing his hand over complainant's mouth, stating, "I don't think that was the best thing to do." Defendant was advised to cease all contact with complainant including going to her place of employment and calling complainant's family and friends.

On or about February 1, 2017, criminal charges were filed on defendant for Assault Family Member (against complainant) Cause number 2134580, court number 011.

On or about February 2, 2017, defendant sent complainant an E-mail stating, "I will give you back the furniture and I will help you out of the financial disaster you have created, I am in love with you, and all of this really makes no sense. I am making over \$7500.00 a week now after taxes, I told you I would get back on top. It's time all this craziness stops and we get back to a life together."

On or about February 5, 2017, complainant filed another police report stating defendant Jacob continues to call her place of employment and send text messages after he was told to stop.

On or about February 6, 2017, complainant called the Houston Police Department regarding defendant's vehicle parked across the street from her place of employment. Complainant observed the defendant standing in the shrubs outside her place of employment. Patrol officer Mercado arrived and found defendant standing at Travis Street and Main Street. Defendant was detained and Harris County warrant for assault family violence was verified. Defendant was arrested on the warrant for assault family member and possession of controlled substance.

On or about February 9, 2017, defendant sent complainant another e-mail saying, "You owe it to say goodbye to the boys. I love you." (Defendant was referring to his sons who live with his ex-wife in Illinois.)

On or about February 11, 2017, defendant sent complainant another E-mail asking for a water painting they had purchased together saying "This was one of my favorite nights of my life."

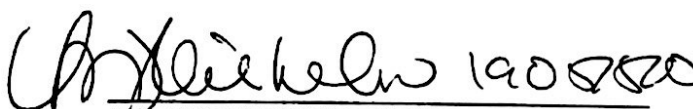
The complainant knows the defendant by name and sight as her previous ex-boyfriend that she dated for approx. 1 year. The complainant made police reports with the Houston Police Department regarding the defendant assaulting her and harassing behavior after ending her dating relationship in January of 2017 when the defendant began showing up at her place of employment. The defendant has a criminal arrest history for Domestic Violence, Violation order Protection, Aggravated Stalking, Intimidation/Physical Harm, Cyberstalking/Cause Apprehension 04/14/2014.

Based on the totality of the circumstances, Affiant believes based on his training and experience that the defendant's behavior would be regarded by a reasonable person as being threatening. Furthermore, the defendant was warned by HPD officers on two occasions that the complainant did not wish to receive any further communication with the defendant and regarded the communication as harassing and stalking behavior. Affiant knows through his training and experience that stalkers will not make outright threats but will continue with seemingly innocuous behavior contact that they are aware the victims find threatening. The defendant's behavior in this instance is consistent with that profile and Complainant stated that she views this contact as threatening and that she fears for her safety.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Sworn to and subscribed before me on February 16, 2017


AFFIANT


ASSISTANT DISTRICT ATTORNEY BAR NO.
OF HARRIS COUNTY, TEXAS.

COMPLAINT