

CAUSE NO. _____
CA CA06525

THE STATE OF TEXAS v. ROBERT MIKELL USSERY

OFFENSE: TERRORISTIC THREAT CAUSE FEAR OF IMMINENT SBI

DEGREE: MB

22.07(c) PC

Offense Code: 16020009

INFORMATION

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

I, Tom Caldwell, County Attorney of Wilson County in said State, at the **Spring** 2018 Term, A.D., of the County Court of Wilson County, on the written Affidavit of **FRANK ASHTON**, a competent and credible person herewith filed, do, in said Court, present, that in the County of Wilson, in the State of Texas, on or about the **5th** day of **March, 2018**, and anterior to the filing of this Information, one **ROBERT MIKELL USSERY**, hereafter "Defendant," did then and there:

Threaten to commit an offense involving violence to a person, namely Pastor Frank Pomeroy, with intent to place Pastor Frank Pomeroy in fear of imminent serious bodily injury.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

County Attorney



No. _____

THE STATE OF TEXAS
COUNTY OF WILSON

COMPLAINT/AFFIDAVIT

In the name and by the authority of the State of Texas, before me, the undersigned authority, on this day personally appeared Investigator Stephen Moore #8376 who, after being duly sworn, on oath says that he has good reason to believe and does believe that on or about the 5th day of March, 2018 and before the filing of this affidavit in Wilson County, Texas.

One: Robert Mikell Ussery DOB 12/11/1963

Did then and there commit the offense of **TERRORISTIC THREAT (PC 22.07.) CLASS B Misdemeanor**, by threatening to commit an offense involving violence to person, namely, hanging, with intent to cause a reaction of any type to his threat by an official or volunteer agency organized to deal with emergencies Wilson County Sheriff's Office and the Constable's Office; place any person in fear of imminent serious bodily injury to wit: threaten to hang the victim's Pastor Frank Pomeroy and Rod Green.

And as probable cause for this belief and for an arrest warrant would show the following. On 3-5-2018, WCSO units were dispatched to the First Baptist Church of Sutherland Springs for a disturbance. Deputies arrived and took the actor into custody for criminal trespass. Statements were taken from both Pastor Frank Pomeroy and Rod Green. In their statements the victims claimed the actor threatened to hang them. Both victims were in fear of their personal safety by the verbal threats and demeanor.

Against the peace and dignity of the state.

[Signature]
AFFIANT

WCSO
AGENCY

Subscribed and sworn to me, the undersigned authority, on this the 5 day of March, A.D. 2018.

[Signature]
Magistrate, Wilson County, Texas
Notary

