

CAUSE NO. 995

STATE OF TEXAS

§
§
§
§
§

IN THE 51ST JUDICIAL

vs.

DISTRICT COURT OF

MERRIL LEROY JESSOP

SCHLEICHER COUNTY, TEXAS

**FIRST SUPPLEMENT TO
NOTICE OF STATE'S INTENT
TO INTRODUCE EXTRANEOUS OFFENSES OR ACTS
PURSUANT TO T.R.E.404(b), 609, and C.C.P. 38.37**

COMES NOW THE STATE OF TEXAS, and files this first supplement to its Notice of State's Intent to Introduce Extraneous Offenses, and would respectfully show the Court the following:

The Defendant in this cause stands charged by indictment with the offense of Sexual Assault of a Child. The State is hereby providing notification to the Defendant of the State's intent, pursuant to the Code of Criminal Procedure 38.37 and the Texas Rules of Evidence 404(b) and 609, to introduce the below-listed extraneous offenses or acts at the trial of this cause. These offenses or acts may or may not be appropriately characterized as extraneous to the offense at issue, but the State nonetheless provides notice.

On or about April 4, 2008, while law enforcement authorities were conducting operations at the Yearning for Zion ("YFZ") Ranch, the Defendant attempted to delete evidence from a computer in his home at the YFZ Ranch, including photographs that documented his relationship with the victim L. Jeffs, her pregnancy, and her having given birth to his child.

On or about April 4, 2008, while law enforcement authorities were conducting operations at the YFZ Ranch, the Defendant did encourage the victim L. Jeffs to falsify information concerning her age to a state agency worker who was conducting an interview of the victim.

On or about April 3, 2008, the Defendant did falsely identify himself as the "uncle" of the victim L. Jeffs, to a health care provider who was providing medical care to L. Jeffs.

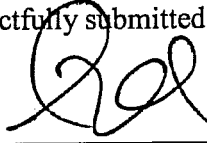
This notice will be further supplemented if and when the State discovers additional items that may or may not be appropriately characterized as extraneous conduct for which notice may be

FILED 2/22/2010 FOR RECORD
PEGGY WILLIAMS, CLERK
COUNTY AND DISTRICT COURT
SCHLEICHER COUNTY, TEXAS
Mary Ann Dwyer
11:35AM

required.

WHEREFORE, PREMISES CONSIDERED, the State respectfully requests that this Court find the requirements of the Code of Criminal Procedure and the Rules of Evidence have been complied with by the State, and for such other and further relief to which the State may be entitled.

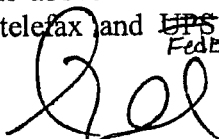
Respectfully submitted,

By: 

Eric J.R. Nichols
Deputy Attorney General
for Criminal Justice
P.O. Box 12548; MC-048
Austin, TX 78711-2548
(512) 936-1311
(512) 474-4570 (fax)
Texas Bar No.14994900

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing filing was delivered to Neil Calfas, attorney for the Defendant, via telefax and ~~UPS~~ ^{FedEx} Overnight Mail No. 798 403757577 on this the 18th day of February, 2010.


Eric J.R. Nichols