

CAUSE NO. 3164

FILED FOR RECORD  
IN THE OFFICE OF  
COUNTY & DISTRICT CLERK  
SCHLEICHER COUNTY  
SMC 2012 NOV 28 A 8:58  
IN THE 51st JUDICIAL DISTRICT

THE STATE OF TEXAS §  
§  
§  
VS. §  
§  
§  
2420 COUNTY ROAD 300, EL DORADO, §  
SCHLEICHER, COUNTY, TEXAS 76936 §

*Greg Williams*  
OF SCHLEICHER COUNTY, TEXAS

51st JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL NOTICE  
OF SEIZURE AND INTENDED FORFEITURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the State of Texas ("Plaintiff") by and through her 51<sup>st</sup> Judicial District Attorney and files this her Original Notice of Seizure and Intended Forfeiture of 2420 County Road 300, Eldorado, Schleicher County, Texas 76936 (hereinafter "Defendant Property"), and alleges the following:

I.

In accordance with TEX. R. CIV. P. 190.1, Plaintiff requests that discovery in this cause be conducted under Level 3, as provided by TEX. R. CIV. P. 190.4.

II.

This proceeding is brought under and by virtue of Chapter 59 of the Texas Code of Criminal Procedure, Articles 59.01(2)(A)(i), (ii), (B)(iv), (xii) and/or (D).

III.

Jurisdiction is conferred upon this Court by virtue of Article V, Section 8 of the Texas Constitution and Article 59.04 of the Code of Criminal Procedure.

IV.

Plaintiff would show that, as to the Defendant Property, the subject of this suit, a search of the real property appraisal district records of Schleicher County revealed that **The United Order of Texas, a common law trust**, is the owner of the Defendant Property and may served

and service is requested by certified mail, return receipt requested, to any of the following trustees of the trust:

- **James Jerry Jessop**, President of the board of trustees, 3520 Knickerbocker Rd. Ste. B, San Angelo, TX, 76904.
- **Isaac Steed Jeffs**, Vice President of the board of trustees, 2424 Rudd Rd., Eldorado, TX, 76936.
- **Keith W. Dutson Sr.**, Secretary of the board of trustees, 385 Colvin St., Colorado City, AZ, 86021.

Plaintiff would like additional citation to be issued for personal service of citation of this suit to **Isaac Steed Jeffs** to be served at Texas Department of Criminal Justice, Institutional Division, Louis C. Powledge Unit, 1400 FM 3452, Palestine, Texas 75803 as it is believed that he may be found for purposes of service from time to time at that location.

Plaintiff would additionally show that at all relevant times Warren Steed Jeffs has been the acknowledged head and leader of the Fundamentalist Church of Jesus Christ of Latter Day Saints, a religious organization for which the United Order of Texas trust was created to support. As the natural person in which all control of church property apparently resides, Plaintiff requests service upon **Warren Steed Jeffs** who may be served and service is requested at the Texas Department of Criminal Justice, Institutional Division, Inmate #1726705, Louis C. Powledge Unit, 1400 FM 3452, Palestine, Texas 75803.

Plaintiff is aware of a potential lien or interest holder to the Defendant Property who may be served and service is requested by certified mail, return receipt requested, to **R&W Excavating, Inc., Boulder Mountain Group, LLC and Willie Jessop** c/o agent attorney Mark F. James, 10 W. Broadway, Suite 400, Salt Lake City, Utah 84101.

V.

Plaintiff complains of real property located at 2420 County Road 300, Eldorado, Schleicher County, Texas 76936 more particularly described as follows:

1,691 acres of land, more or less, out of section 71, Block LL, GC & SF RR Co. Survey, Abstract No. 180; Section 67, Block LL, GC & SF RR Co. Survey, Abstract No. 178; Section 69, Block LL, GC & SF RR Co. Survey, Abstract No. 179; Section 70, Block LL, GC & SF RR Co. Survey, Abstract Nos. 1428, 1431, 1433, 1434, 1436, 1437, and 1439; and Section 86, Block LL, TC RR Co. Survey, Abstract No. 1435, Schleicher County, Texas; and being described in the following two tracts:

Tract One: 320 acres of land, more or less, being the east half of Section 71, Block LL, GC & SF RR Co. Survey, Abstract No. 180; being the same tract conveyed in that certain Warranty Deed, dated December 31, 2003, executed by Kirk L. Griffin to YFZ Land Company LLC and recorded in Volume 438, Page 783 of the Official Public Records Schleicher County, Texas; and being Tract 1 in that certain Warranty Deed, dated January 1, 2009, executed by Texan Heritage, a Common Law Trust to United Order of Texas, a Common Law Trust and recorded in Volume 469, Page 395 of the Official Public Records, Schleicher County, Texas;

Tract Two: 1,371 acres of land, more or less, out of Section 67, Block LL, GC & SF RR Co. Survey, Abstract No. 178; Section 69, Block LL, GC & SF RR Co. Survey, Abstract No. 179; Section 70, Block LL, GC & SF RR Co. Survey, Abstract Nos. 1428, 1431, 1433, 1434, 1436, 1437, and 1439; and Section 86, Block LL, GC & SF RR Co. Survey, Abstract No. 1435; being the same tract conveyed in that certain Warranty Deed, dated November 20, 2003, executed by Johnny Isaacs et ux, Susie Isaacs, aka Susan Gail Isaacs to YFZ Land LLC and recorded in Volume 438, Page 61 of the Official Public Records, Schleicher County, Texas; and being Tract 2 in that certain Warranty Deed, dated January 1, 2009, executed by Texan Heritage, a Common Law Trust to United Order of Texas, a Common Law Trust and recorded in Volume 469, Page 395 of the Official Public Records, Schleicher County, Texas.

## VI.

Plaintiff complains of the aforementioned Defendant Property and would show that said property is contraband as defined by Article 59.01 of the Code of Criminal Procedure. Said Defendant Property was seized pursuant to a search and seizure warrant on or about November 27, 2012 in Schleicher, County, Texas. Attached hereto as Exhibit "A" is the affidavit of the Seizing Officer as evidence of the seizure of the Defendant Property and reasons therefor. Plaintiff would show that said Defendant Property is contraband subject to forfeiture because it was acquired with proceeds of or was used or intended to be used in the commission of:

Texas Penal Code Section 22.011 (Sexual Assault);

Texas Penal Code Section 22.021 (Aggravated Sexual Assault);

Texas Penal Code Section 25.01 (Bigamy);

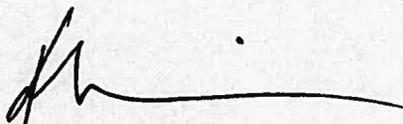
Texas Penal Code Section 71.02 (Engaging in Organized Criminal Activity); and/or

Texas Penal Code Section 34.02 (Money Laundering).

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, the State of Texas prays that upon hearing, the Court enter a finding that the Defendant Property is contraband, and upon such finding to order the forfeiture of said property to the State of Texas with the 51<sup>st</sup> Judicial District Attorney acting as agent for the State, and then to be administered and disposed of by said office in compliance with Article 59.06 of the Code of Criminal Procedure.

Respectfully Submitted,



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**ATTORNEY FOR PLAINTIFF  
THE STATE OF TEXAS**