IN THE SUPERIOR COURT COUNTY OF SAN DIEGO, STATE OF CALIFORNIA AFFIDAVIT FOR SEARCH WARRANT

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STATE OF CALIFORNIA)

(ss.

COUNTY OF SAN DIEGO)

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I, Sharon Lunsford do on oath make complaint, say and depose the following on this March 05, 2001, that I have substantial probable cause to believe and I do believe that I have cause to search the premises, including all rooms, safes, storage areas, containers, surrounding grounds, trash areas, garages and outbuildings and any vehicles assigned to or part of the residence located at 8961 N. Magnolia Ave. apartment number 53, in the city of Santee, County of San Diego, state of California; the residence is contained in a multi unit apartment complex known as the "Sanside Apartments" being of tan and olive in color; apartment number 53 further described as being downstairs on the north side of a walkway with the numbers "53" appearing on the south of the front door in black lettering.

The search for the following property, whether in digital, magnetic, physical form to wit: firearms, including boxed or loose ammunition, casings, cleaning equipment and holsters; expended rounds and/or projectiles; crime scene measurements and photographs; handwritings, diagrams of a school or other location, books containing information regarding survivalist or terrorist techniques or and/or journals containing personal writings, fingerprints, documents and effects which tend to show possession, dominion and control over said premises including keys, photographs, taped voice and/or video images, computer systems including electronic data storage; devices including computer CPU's (central processing units) or servers, hard disks, hard disk drives, external drives and/or tapes or disks, storage media, terminals and/or video display

units and/or receiving devices and any peripheral equipment such as printers, automatic dialers, moderns, acoustic couplers, associated telephone sets, routers, and any other controlling devices; and/or any computer data files which may contain the above described names including but not limited to email files, username and or password files, system access logs or files, contact, referral or telephone lists, and/or deleted files, and or any lists of names of persons stored in physical or electronic media files, and to seize said files if found and later forensically examine the files, media and or computer CPU's; and/or any mail opened or unopened and papers, including diagrams, lists, diaries, times schedules, pagers, anything bearing a persons' name, social security number, drivers' license number or other form of identification, including the interception of incoming calls.

The terms "records," "documents," and "materials" include all information recorded in any form, visual or aural, including the originals and all non-identical copies thereof, whether different from the original by reason of any notation made on such copies or otherwise.

I arr a peace officer employed by the San Diego County Sheriff's Department and have been so employed for about twenty years. I am currently assigned to the Homicide Division and have been so assigned for about four years. During my career, I have investigated or assisted in the investigation of at least 100 homicide cases, as well as numerous attempted homicide and serious assault cases.

During the course of my duties, I have learned the following information based upon my discussions with the named witnesses or by having read the reports of or talked with other SDSD Deputies who have spoken directly with the named witness. All references to dates refer to the current calendar year unless otherwise stated.

At 9::20 a.m. on Monday, March 5, 2001, Sheriff's deputies responded to the Santana High School located at 9915 Magnolia in the County of San Diego, Ca. It had been reported that shots had been fired and people at the school had been wounded. Sheriff's deputies took 15 year old Charles Andrew Williams into custody at the school and seized a .22 caliber revolver. Also located were numerous expended .22 casings and at least one live round on Charles's person.

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 Investigation disclosed that two people had been killed and twelve wounded. Of these, all were believed to be either teachers or students on the campus. Sheriff's Special Enforcement Division deputies searched the entire school and were unable to locate any other suspects.

Charles's father was interviewed by Sheriff's Detective Roberson. Mr. Williams

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indicated that Charles had moved with him from 29 Palms. California to Santee in the last six

months. Mr. Williams noted that Charles's behavior had changed in that time in that Charles had

started skipping school and talking back to him. Mr. Williams said that there were several guns
in the house including a .22 revolver, a .22 rifle, 243 bolt-action rifle, several shotguns and a

BB gun. Mr. Williams said these weapons were locked in a gun cabinet. Mr. Williams said he
had taken Charles shooting on several occasions and that Charles had fired the weapons.

I participated in an interview of Charles Andrew Williams along with Sheriff's detective Jim Walker. Charles was read his rights under the fifth and sixth amendments according to the standard Sheriff's Department admonishment. He indicated that he understood his rights and wished to talk to us.

Charles said that he had moved from Maryland and, more recently, from 29 Palms and that the people in Santee were different from those he had Imown before. He said he had made friends but was disappointed with the school in Santee. For this reason, he had begun to skip school and had been "locked out" on several occasions when he arrived late for school. This made him angry at the school.

Charles said he had decided the previous week that he was going to shoot people at schoo'. He had told his friend Joshua his plan. He had considered that he would be hurting people and that he might be punished for this behavior but had decided to do it anyway. He understood that this behavior was wrong and that it would result in injuring or killing people. He

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 said that, while he did not intend to kill any particular person, if someone died, they died. He had reached his decision to do this the previous Friday.

On Monday morning, March 5, 2001, he obtained his father's .22 handgun from the locked gun cabinet. He said he knew where the key was, but had no permission to use the firearm. He placed the firearm in his backpack along with 40 rounds of .22 ammunition. He counted the ammunition to be sure of how much he had.

At school, Charles said he went to the bathroom and entered a toilet stall. There he loaded the revolver. He then left the stall and shot a student he knew as Brian as Brian used the urinal. Charles said he shot Brian in the head. Charles then shot a student he knew as Trevor and to d him to shut up. Charles said he then went to the bathroom doorway and began to shoot other people nearby without regard. During the course of the shooting, he reloaded the revolver four times and shot people who were still present at the scene.

Charles said when he finished shooting he had one round of ammunition left and had planned to run away and shoot himself. He was prevented from doing this by police officers who arrived sooner than he had expected them to.

In the interview Charles stated that he and his father had a computer in the apartment and that Charles was allowed to utilize the computer and did so to send electronic mails to his friends.

As a peace officer, I am aware that residences will often contain evidence of the identity of the persons who live there. These documents will include: photographs, bills, and other identification. Additionally, experience teaches those who use firearms also possess ammunition, holsters and containers for such firearms, as well as cleaning equipment, targets, bullets, cartridges, primers, gunpowder, reloading equipment and associated documents such as receipts related to the transfer and repair of such weapons in their residence. Such items must be

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examined to determine if additional ammunition and other items match the firearm and ammunition found with the suspect. This is significant circumstantial evidence of possession of the type of weapon used in the shootings.

It is further the experience of your affiant that individuals will commonly utilize computers to store personal writings and diaries and other writings that contains information of their desires, thoughts or fantasies. These individuals sometimes utilize a computer to express those thoughts, desires, or fantasies to others.

Based on my training and experience and the facts stated above, I am of the opinion that the victims died as the result of a homicide as opposed to some natural cause or suicide. It is my training and experience that the above described property, or a portion thereof, is currently at the described premises and is necessary in proving: the cause of death; the circumstance leading to the deaths; planning, premeditation, motive; and, to circumstantially identify the perpetrator of the crime. The type of assault leading to a homicide generally spawn the type of evidence requested, some of which may have come from the suspect, some from the victim.

The evidence of dominion and control as described is necessary in establishing who was present at the premises and who controlled the premises. Such evidence is necessary to the identification of the perpetrator, and such evidence is normally left or maintained within premises by those in control or by those visiting such premises. Handwritings and fingerprints are subject to positive identification by experts. Also, clothing, photographs, canceled mail and the like are routinely maintained in a persons' premises as necessary and incident to maintaining such premises. Persons frequently have taped voice messages on answering machines, home videos, and pagers which also will reveal identification. In addition, by intercepting phone calls at the premises while the search warrant is being executed, hexpect to talk with persons who are familiar with the persons in control of the premises and will so testify. Such callers and

described dominion and control evidence is vital to proving control over the described property to be seized. A thorough search of the premises is necessary in order to establish the exact location of the assaults and murders, their extent, and the circumstances surrounding the assaults and murders. Therefore, based on my training, experience, and the above facts, I believe that I have substantial cause to believe the above described property or a portion thereof will be at the described. premises when the warrant is served. Based on the aforementioned information and investigation, I believe that grounds for the issuance of a search warrant exist as set forth in Penal Code section 1524. I, the affiant, hereby pray that a search warrant be issued for the seizure of said property, or any part thereof, from said premises at any time of the day, good cause being shown therefor, and that the same be brought before this magistrate or retained subject to the order of this Court. Given under my hand and dated this March 5, 2001. Subscribed and sworn to before me this March 5, 2001 Judge of the Superior Court County of San Diego

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IN THE SUPERIOR COURT COUNTY OF SAN DIEGO, STATE OF CALIFORNIA SEARCH WARRANT

No.	

The People of the State of California, to any sheriff, constable, marshal, police officer, or any other peace officer in the County of San Diego:

Proof, by affidavit, having been this day March 5, 2001, made before me by Sharon Lunsford, a peace officer employed by the San Diego County Sheriff's Department, that there is substantial probable cause for the issuance of the search warrant pursuant to Penal Code section 1524, you are therefore, commanded to make search at any time of the day, good cause being shown therefor, the search the premises, including all rooms, safes, storage areas, containers, surrounding grounds, trash areas, garages and outbuildings and any vehicles assigned to or part of the residence located at 8961 N. Magnolia Ave. apartment number 53, in the city of Santee, County of San Diego, state of California; the residence is contained in a multi-unit apartment complex known as the "Sanside Apartments" being of tan and clive in color; apartment number 53 further described as being downstairs on the north side of a walkway with the numbers "53" appearing on the south of the front door in black lettering.

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peripheral equipment such as printers, automatic dialers, it odems, acoustic couplers, associated telephone sets, routers, and any other controlling devices; and/or any computer data files which may contain the above described names including but not limited to email files, username and or password files, system access logs or files, contact, referral or telephone lists, and/or deleted files, and or any lists of names of persons stored in physical or electronic media files, and to seize said files if found and later forensically examine the files, media and or computer CPU's; and/or any mail opened or unopened and papers, including diagrams, lists, diaries, times schedules, pagers, anything bearing a persons' name, social security number, drivers' license number or other form of identification, including the interception of incoming calls, and, if you find the same, or any part thereof, to bring it forthwith before me at the Superior Court of the San Diego Judicial District, County of San Diego, State of California, or to any other court in which the offense in respect to which the property or things is triable, or retain such property in your custody, subject to the order of this Court, pursuant to section 1536 of the Penal Code, and to dispose of said property pursuant to law when the property is no longer of evidentiary value.

Given under my hand and dated this March 5, 2001.

Judge of the Superior Court

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