

STATE OF CALIFORNIA - COUNTY OF SANTA BARBARA
SANTA BARBARA COUNTY JUDICIAL DISTRICT

**SEARCH WARRANT AND AFFIDAVIT
(AFFIDAVIT)**

Detective Greg Wilkins, Santa Barbara Police Department, swears under oath that the facts expressed by him/her in the attached and incorporated statement of probable cause are true and that based thereon he has/she has probable cause to believe and does believe that the property and/or person described below is lawfully seizable pursuant to Penal Code Section 1524, as indicated below, and is now located at the locations set forth below. Wherefore, your affiant requests that this Search Warrant be issued.

HOBBS SEALING REQUESTED: YES NO

NIGHT SEARCH REQUESTED: YES NO

(Signature of Affiant)

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SANTA BARBARA: proof by affidavit having been made before me by **Detective Greg Wilkins, Santa Barbara Police department**, that there is probable cause to believe that the property and/or person described herein may be found at the locations set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 as indicated below by "x" (s) in that it:

- was stolen or embezzled.
- was used as the means of committing a felony.
- is possessed by a person with the intent to use it as a means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery.
- tends to show that a felony has been committed or that a particular person has committed a felony.
- tends to show that sexual exploitation of a child, in violation of Penal Code Section 311.3, has occurred or is occurring:
- there is a warrant for the person's arrest.

YOU ARE THEREFORE COMMANDED TO SEARCH: The premises at 165 West Inglewood Place, Los Angeles, California, being further described as follows: a one story brown cottage style residence with the numerals 165 over the front door, which is white in color, along with an attached garage that is located to the left of the house as you look at it from the street, and as further described on the attached Google map of the residence.

A 1998 Chevrolet pick up truck, yellow in color, bearing California license plate T569344

FOR THE FOLLOWING PROPERTY: (1) White cowboy hat (2) long sleeved white western style shirt with white embroidery on the front and on the collar of the shirt (3) Jade items, being further described as 15 separate Jade items, approximately 6 inches to 12 inches in height, all on brown wooden bases, and all depicting animals or persons (4) one 2004 Cadillac El Dorado, gold in color, bearing California license plate 7 yaw 965 and (5) articles of personal property tending to show the identity of the persons residing at the above residence and or having access to the above described vehicles, including rent receipts, cancelled mail envelopes, and keys.

AND TO SEIZE IT IF FOUND and retained by you as evidence in this case. Stolen property may be returned to the owner, and contraband destroyed when not needed for criminal prosecution without any further court order. All other property may be returned, destroyed, used, or sold at auction after reasonable diligence to located and notify the owner, and no response is received within 90 days of such notice.

This Search Warrant and incorporated Affidavit was sworn to as true and subscribed before me this 6th **day of** May, **2012, at** _____ **A.M./P.M.** Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

HOBBS SEALING APPROVED: YES NO

NIGHT SEARCH APPROVED: YES NO

(Signature of Magistrate)

Judge of the **Superior** Court, Santa Barbara County Judicial District

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 I, Detective Greg Wilkins, Santa Barbara Police Department, swear and affirm that
2 the following is true and correct:

3
4 I am a detective for the Santa Barbara Police department, and have been employed as
5 a police officer by the City of Santa Barbara for the last 20 years, the last 10 of which I
6 have been assigned to the robbery-homicide division of the police department.

7
8 On April 4, 2010 I personally spoke to a crime victim identified as Rose Zubeck. She
9 told me that on April 3 she was working alone in her clothing store located at 302 State
10 street In Santa Barbara. She sells second hand clothing at the store and she said she
11 has been working in the clothing business for 20 years, all of it at this same store
12 location. She related that on the 3rd of April she was running a vacuum cleaner at the
13 store when she saw a man and a woman in the store. She said she shut off the vacuum
14 cleaner and asked them if she could help them, and they both replied that they were just
15 looking around. She resumed her vacuum work and moments later she told me that she
16 saw and felt an arm go around her neck from behind and begin to choke her. She said
17 that the arm was a black person as she could see the skin color and that the person
18 was wearing a long sleeved white shirt which she could also see, but she could not see
19 the persons face. She woke up the following day in a hospital bed at the Santa Barbara
20 Cottage Hospital with severe head and face injured. When I spoke to her she was in the
21 intensive care unit and was badly bruised in the area of her head and face and neck.
22 She told me that before she was assaulted she did look at the man and the woman in
23 the store and described them to me as follows: a large very fat white woman, blond hair,
24 about 5 feet 6 inches tall and a tall thin black man wearing a white cowboy hat and a
25 long sleeved white western style shirt with white embroidery on the front of the shirt.
26 She said that she does not know if the man in the white shirt was the one who assaulted
27 her as she did not see his face at the time of the assault, but that the clothing on the
28 man she saw and the clothing on the sleeve of the black person who assaulted and
29 choked her appeared to her to be similar. She said that the money from the store was
30 all stolen, amounting to @ \$400 dollars.

31

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 On April 7, 2012 I was contacted by a Santa Barbara Police department patrol officer,
2 Steve Gonzalez. He told me the following: he said he had just come back form cottage
3 Hospital after following an ambulance there which resulted from a call he received
4 earlier while on duty. He as sent to the apartment of a woman identified as Mary Jones,
5 360 West Padre Street, Apartment 6, in Santa Barbara. Officer Gonzalez told me that
6 when he got there he spoke to Ms Jones, age 45, who told him that she lives next door
7 to a man named "Ritchie"- who lives in Apartment 5. She said she did not know
8 "Ritchie's" last name, but that he lived alone and that he drove gold Cadillac El Dorado.
9 She said she called the police as she has been hearing a terrible whining sound for the
10 last two days coming through the wall of the apartment from next door in Ritchie's
11 apartment, and thought that there was a dog trapped in the house. She said Ritchie's
12 car was not in the parking area of the apartment and she had not seen him for 3 days.
13 Officer Gonzalez then told me that he could hear the same sound from both inside Ms
14 Jones apartment and from outside the front door of Apartment 5. He saw that the front
15 door was open slightly- abut 2-3 inches. He knocked on the door and announced that
16 the police were there and to open the door and come out. No one responded. He than
17 told me he asked the Santa Barbara Police dispatcher to call the apartment – and then
18 heard the phone ringing inside but no one answered. Officer Gonzalez then said he
19 decided that he was going to enter the apartment and did so. In searching the
20 apartment he found a man, later identified as Richard Murphy lying on the floor between
21 his bed and the wall separating the apartment from that of Ms Jones, and that Mr.
22 Murphy was unresponsive but alive. He called an ambulance and followed the
23 ambulance to cottage Hospital. He said he was unable to speak to Mr. Murphy as Mr.
24 Murphy was unresponsive to questioning and hospital personnel were working
25 feverishly on him to save his life.

26

27 Officer Gonzales then told me the above information as he knew that I was the detective
28 assigned to the robbery and assault of Ms. Zubeck, and that there might be some
29 connection since the injuries were similar. Officer Gonzales saw that Mr. Murphy was
30 severely beaten about the head.

31

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 I went to cottage Hospital on April 8 and spoke to Dr Adam Brown, a neuro-surgeon
2 who was one of the treating doctors for Mr. Murphy. He told me that Mr. Murphy was
3 severely beaten or kicked in the head numerous times, causing a concussion and
4 unconsciousness, and that he had been unconscious for a few days before being
5 brought to the hospital. His life was no longer in danger but he was still unable to
6 communicate verbally or otherwise.

7
8 While at the hospital I was contacted by the daughter of Mr. Murphy- who identified
9 herself as Anne Wickham (her married name) Mrs. Wickham told me that her dad lived
10 alone and that she had gone to the apartment but she could not get inside, as there
11 were police seals on the door. I told her that the seals were placed there by myself after
12 I served a search warrant for the apartment. She agreed to go back to her dad's
13 apartment with me to examine it further. We did so that same day and she told me that
14 her dad had an expensive collection of green jade items, all of people or animals and all
15 between 6 and 12 inches tall on wooden brown bases. She was not sure how many he
16 had but thought there were about 12 of them. I noticed a multi shelf glass case in the
17 apartment and I could see dust rings where items were once on the shelf but were no
18 longer there- I counted 15 spots where I believe items were recently removed. All of
19 them were missing from the apartment. She also said her dad had gold Cadillac El
20 Dorado and that it was no in the parking spot for the apartment. We both searched the
21 apartment and could not find the car keys.

22
23 Mrs. Wickham told me that he dad lived alone but that he liked to drink, and often drank
24 at neighborhood bars. With this information I asked Santa Barbara Police department
25 volunteers to canvass the area near Ritchie's apartment with flyers asking for
26 information on what happened. We started this on April 9th. The next day I received two
27 telephone calls. One of them was a man who I went and personally met with- identified
28 as Jake Stoddard. Mr. Stoddard, age 50- told me he knew Ritchie and saw him in a bar-
29 restaurant a few days before- he could not remember the exact date- and that he was
30 with a very large and fat white woman and a tall black man who was wearing a long
31 sleeved white shirt and a white cowboy hat. He said he did not know either of these

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 people. He said he had a drink and then left, but that the cook at the restaurant had
2 planed to go with Ritchie and some other people e to have some more drinks. The cook
3 he identified as Eric Baker- and Mr. Baker had also called the police department in
4 response to the information wanted flyer we distributed, so I had his number, and spoke
5 to him the same day.

6 He told me that he was drinking with Ritchie and Mr. Stoddard, and was also with a
7 large very heavy white woman who had blond hair, and a tall thin black man who had on
8 a cowboy hat- white in color. He said they met two “ English girls” (his words) who
9 went drinking with them- and that they went to the Santa Barbara Harbor to Mr.
10 Stoddard’s boat where the group continued to drink. He also described tha large white
11 woman with blond hair and the tall thin black man, and added that the man had on a
12 long sleeved white shirt and also remembered the white cowboy hat. He did not know
13 the name of the two English girls, but in response to my asking him, said that the two
14 women from England were “taking lots of photos” and for sure they had a photo of the
15 black man and the large white woman, along with everyone else in the group.

16

17 For the last two weeks I have been attempting to locate the two “English girls” but until
18 today I was unsuccessful.

19

20 On today’s date I had made arrangements to return to Ritchie’s apartment to give the
21 keys back to his daughter. I arrived first and was sitting in the apartment when the
22 phone rang. I answered it, and the woman on the other end of the line asked for
23 “Ritchie.” On further inquiry, because I immediately recognized the “English” accent, the
24 woman told me that she and her friend were on a tour of California, had been in Santa
25 Barbara some weeks ago and had met Ritchie and others on a boat, and now that they
26 were on their way back to England they were once again passing through Santa
27 Barbara from san Francisco and wanted to get together with Ritchie again. I made
28 arrangements for the police patrol division to go to their hotel and bring them to the
29 station. At the station both of the women, identified as Eunice Clarke and Alice Brent,
30 told me that they were in fact on the boat with Ritchie and the others mentioned above,
31 and gave me their camera and film. I had the pictures printed and immediately

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 distributed to all members of the police department. Within an hour I got a call from
2 Adam Taylor, a Santa Barbara police Officer assigned to our juvenile bureau. He told
3 me he recognized the photo of the large white woman with blond hair as a classmate of
4 his from high school- giving me her name as SUSAN ANDREWS. I did a check with the
5 department of Motor Vehicles and found a match for a SUSAN ANDREWS in the
6 database, along with a DMV photo and her current address. I looked at the DMV photo
7 and the photo of the large white woman from the boat- and am of the opinion that they
8 are the same person. The DMV currently lists an address for SUSAN ANDREWS as
9 165 West Inglewood Place in Los Angeles County. I then ran a check on her driving
10 record and found that she has received tickets while driving a 1998 Chevrolet pickup,
11 yellow in color, bearing California plate T 569344.

12
13 I also conducted a search of the on line data base for Santa Barbara county and found
14 that Tom and Susan Andrews were married in Santa Barbara on July 14, 2009

15
16 I ran a DMV check on Ritchie also and found the Cadillac El Dorado listed on the
17 Search Warrant as being registered to him. The car has not been recovered as of this
18 date and time.

19
20 I then ran the yellow pickup truck and found tickets in the name of TOM ANDREWS. I
21 requested his DMV photo and identification information, and found that his height is
22 listed at 6 feet, 1 inch tall and that his current DMV address is the same West Inglewood
23 address listed above. I looked at the photo and believe that the same person on the
24 "boat" photos showing a tall thin black male with a white cowboy hat and a long
25 sleeved white shirt are the same. In this connection I was told by Mr. Stoddard that
26 when Ritchie left his boat he was very drunk, and that the tall black man and the large
27 fat white woman were with him in Ritchie's car- with the black man driving the Cadillac
28 as they left the harbor.

29
30 Earlier this afternoon I called the Los Angeles Police Department felony fugitive detail
31 and spoke to Det. Sgt. Ivan Brooks. He drove me to the West Inglewood address listed

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

1 on the warrant and called me back, saying that the yellow pickup listed on the warrant
2 was parked in the driveway to the residence, and he also gave me the description of the
3 residence as I have described it on the warrant. He tried to look in to the garage but
4 could not get to a place where he could make the observation safely so he was unable
5 to tell me if the Cadillac was in the garage. Sgt. Brooks also told me that TOM
6 ANDREWS recently got a ticket (on May 3) for jaywalking near the Los Angeles Airport,
7 and listed his address as 165 West Inglewood Place.

8
9 Based on the above information I believe that the clothing items and stolen jade will be
10 located in the residence or in the vehicle listed above, and that the Cadillac may also be
11 hidden in the garage. It has been my training and experience that persons who commit
12 the crime of theft will often keep the loot from the crimes at their place of residence or in
13 their vehicle.

14 I am also attaching two felony arrest warrants for the arrest of Tom and Susan Andrews
15 for robbery in violation of California Penal code Sec 211 (a)

16
17
18
19

THE AFFIANT

Your affiant has also drafted over 60 search warrants and assisted in the service of over 100 search warrants.

Your affiant commenced the actual physical mechanics of preparing this affidavit and attached search warrant at **1000 hrs.** of **May 6, 2012** and your affiant affixed his signature under oath to this affidavit before the undersigned magistrate at the time and date attested by said magistrate; the elapsed time reflected herein has been diligently utilized by your affiant in the mechanics of physically preparing these documents, locating and consulting with Deputy District Attorney **Brian Cota** of the County of Santa Barbara, in reference to the aforementioned preparation; locating the appropriate magistrate, and transporting these documents to the magistrate for his official action in connection therewith.

Your affiant has reasonable cause to believe that grounds for the issuance of a search warrant exist, as set forth in section 1524 of the Penal Code, based upon the aforementioned information, fact, and circumstances.

Wherefore your affiant prays that a search warrant be issued for seizure of said property to be disposed of according to law.

I DECLARE UNDER PENALTY OF PERJURY THAT THE INFORMATION GIVEN ABOVE IS TRUE AND CORRECT. EXECUTED THIS 6TH DAY OF MAY, 2012, AT SANTA BARBARA, CALIFORNIA.

Signature of affiant

Detective

Position of affiant