

AFFIDAVIT AND STATEMENT

OF

PROBABLE CAUSE

Your Affiant, Trooper Andrew Hays, Maryland State Police, Barrack 6, Westminster, Carroll County, Maryland, declares and affirms under the penalties of perjury that the following facts and circumstances constitute probable cause for the issuance of a search and seizure warrant for the premises described in the attached request for a search and seizure warrant, and for the vehicle, which is also described in the attached request for a Search and Seizure Warrant.

On August 29, 1979, at 12:30 p.m. Your Affiant was notified by the Westminster Maryland State Police Barrack Police Communications Officer to proceed to the residence of Robert Myers, located on Turkey Foot Road, 1/2 mile from Route 97, Westminster, Carroll County, Maryland. Upon arrival at the said location, Your Affiant met with three young white females who identified themselves to be employees of Robert Myers' Maryland Business Service. All of the females were upset, and reported to Your Affiant that they had come to the residence of Robert Myers because they were concerned as to the welfare of Mrs. Robert Myers, due to the fact that they had had a conversation with her the previous evening, August 28, 1979, in which the said Mrs. Myers was extremely upset regarding a marital problem. Your Affiant was directed to a bedroom where Your Affiant observed the partially clothed body of a white female. Upon closer observation, Your Affiant observed numerous gunshot wounds in the body of the said white female. In addition, Your Affiant also observed that the head of the white female was covered by a pillow. In addition, Your Affiant also observed several guns of various makes and calibers scattered about the room in close proximity to the body. Your Affiant also observed that the bedroom area was in a state of disarray, appearing as if it had been ransacked.

During the interview of the aforementioned employees of Robert Myers, Your Affiant also learned that on the evening of August 28, 1979, the said Mrs. Myers had a rash of diamond rings on her fingers. Your Affiant noted that no diamond rings were present on the fingers of the victim. Your Affiant did not observe

IN THE

FOR

CARROLL COUNTY

APPLICATION AND AFFIDAVIT FOR SEARCH AND SEIZURE WARRANT

To the Honorable Judge Dr. G. W. G. G. G. of the CARROLL COUNTY of Carroll County, the undersigned, being duly sworn, deposes and says that he has reason to believe that in the vehicle described as a 1977 Lincoln Continental, silver in color, bearing Maryland Bicentennial registration plates with the number 824 ADP, presently located in the garage portion of the dwelling located at 4636 Turkey Foot Road, Westminster, Carroll County, Maryland, in the County of Carroll, there is presently being concealed certain property: namely, evidence relating to the manner, cause and method of the perpetration of the homicide, and evidence relating to and tending to identify the perpetrator (s) of the homicide, including but not limited to, trace evidence such as fingerprints, footprints, tire tracks, hair, blood, fibers, and clothing, which is evidence relating to the commission of a crime pertaining to the murder of a white female whose body was found in the bedroom of the aforementioned premises AND that the facts tending to establish grounds for issuance of a Search and Seizure Warrant are set forth in the Affidavit attached hereto and made a part hereof.

*Robert L. Myers*

*Robert C. Myers* 2153  
SHERIFF OF CARROLL COUNTY

*Thomas P. Jones*  
SHERIFF OF CARROLL COUNTY

IN THE

FOR

CARROLL COUNTY

SEARCH AND SEIZURE WARRANT

To: Any Police Officer of Carroll County

Affidavit having been made before me by Trooper Andrew Hays, Maryland State Police that he has reason to believe that in the vehicle described as a 1977 Lincoln Continental, silver in color, bearing Maryland Bicentennial registration plates with the number B24 ADP, presently located in the garage portion of the dwelling located at 4695 Turkey Foot Road, Westminster, Carroll County, Maryland, in the County of Carroll, there is presently being concealed certain property: namely, evidence relating to the manner, cause and method of the perpetration of the homicide, and evidence relating to and tending to identify the perpetrator (s) of the homicide, including but not limited to, trace evidence such as fingerprints, footprints, tire tracks, hair, blood, fibers, and clothing, which is evidence relating to the commission of a crime pertaining to the murder of a white female whose body was found in the bedroom of the aforementioned premises and I am satisfied that there is probable cause to believe that the property so described is being concealed on the vehicle above described and that the foregoing grounds for application for issuance of the search warrant exist. These grounds as stated on the application and affidavit attached hereto and incorporated herein by reference.

You are therefore commanded, with the necessary and proper assistants, to search forthwith the vehicle herein above described for the property specified, executing this warrant and making the search; and if the property be found there, to seize it; and if upon execution of this warrant, there are found persons then and there engaged in the commission of a crime, arrest those so participating; leaving a copy of this warrant, application and affidavit with an inventory of the property seized and returning a copy of said warrant and inventory, if any, to me within five days after execution of this warrant; or, if not served, to return this warrant to me within five days after its expiration, as required by law.

DATED this 5 day of August, 1971. *[Signature]*

any of the said rings anywhere in or near the bedroom area.

During the course of the preliminary investigation, Your Affiant advised that the 1977 Lincoln which is described in the attached application for a search and seizure warrant was located in a garage which is part and parcel and physically attached to the said premises to be searched. Your Affiant learned that the victim, the said Mrs. Robert Myers was last seen alive at approximately 5:30 pm. on August 28, 1979 driving the said 1977 Lincoln Continental.

At the time that Your Affiant went into the premises to be searched to conduct a preliminary investigation and make a determination as to the nature and substance of the injuries of the victim, Your Affiant noted on the way to the bedroom area that there was another room in the said house that appeared to be ransacked and in a state of disarray. In addition, Your Affiant went to another room in the house for the purpose of using a telephone to call the Westchester Barrack, and Your Affiant noted that this particular room which contained a pool table was also in a state of disarray.

Based on Your Affiant's observations of the body of the victim, who is identified as Mrs. Robert Myers, the nature of the injuries, the state of disarray of the house, and a preliminary interview of witnesses, Your Affiant has probable cause to believe that the said victim was the victim of a felonious homicide and that the said premises and vehicle contain evidence pertaining to manner and nature of the homicide, and pertaining to and tending to identify the perpetrator(s) of the said homicide.

Therefore Your Affiant prays that Honorable Court issue a Search and Seizure for the said premises and for the said vehicle.

*[Handwritten signature]*  
\_\_\_\_\_  
Affiant

Subscribed and sworn to before me at 111 N. 1st St. Gettysburg  
Judge of the Circuit Court for Carroll County, this 28 day of  
August, 1979.

*[Handwritten signature]*  
\_\_\_\_\_  
Judge