

CAUSE NO. 1618353

THE STATE OF TEXAS

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IN THE 183<sup>RD</sup> JUDICIAL  
DISTRICT COURT OF  
HARRIS COUNTY, TEXAS

VS.

TORREY LEON

MOTION FOR THE APPOINTMENT OF INVESTIGATOR

TO THE HONORABLE JUDGE PRESIDING IN SAID COURT:

COMES NOW, **TORREY LEON**, Defendant in the above styled and numbered cause, by and through his attorney of record, EILEEN BOGAR, respectfully moves the Court to appoint and provide expenses of investigation and expert testimony for **BRANDON PLAGENS**, Private Investigator, to assist in the preparation of his defense, and would show cause unto the Court as follows:

I.

The Defendant is charged with **BURGLARY OF HABITATION**, alleged to have been committed in Harris County, Texas.

II.

The Defendant is indigent and without funds to make his own arrangements for retaining a Private Investigator.

III.

Appointment of a private investigator is necessary to insure that the defendant receive his rights to effective assistance of counsel, cross-examination and confrontation, and compulsory process, guaranteed by the Sixth and Fourteenth Amendments to the United States Constitution and Article I, § 10 of the Texas Constitution; due process and due course of law, guaranteed by the Fourteenth Amendment to the United States Constitution and Article I, §§ 13, 19 and 29; and, equal protection of the law, guaranteed by the Fourteenth Amendment to the United States Constitution and Article I, §§ 3 and 3a of the Texas Constitution.

IV.

In order to conduct and complete a thorough investigation, it is imperative that all law enforcement agencies within The State of Texas permit and extend the same courtesy and access afforded defense attorneys, to **BRANDON PLAGENS** for interviewing of the Defendant and all witnesses that may be held in law enforcement custody, and that said investigator be afforded an unprejudiced opportunity to interview all witnesses know to the State, and the Defendant.

V.

WHEREFORE, premises considered, the Defendant prays that the Court will grant this Motion for the Appointment of Investigator, and appoint **BRANDON PLAGENS**, Private Investigator, to assist him in the preparation of his defense and heretofore stated reasons that the Court order the Treasurer of Harris County, Texas to pay the cost of such investigative services directly to **BRANDON PLAGENS**.

Respectfully submitted:

/s/ Eileen Bogar

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VS.

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IN THE 183<sup>RD</sup> JUDICIAL

DISTRICT COURT OF

HARRIS COUNTY, TEXAS

ORDER FOR THE APPOINTMENT OF INVESTIGATOR

On this day came on to be heard the Defendant's Motion for the Appointment of Investigator in order that he may assist the defense in the above styled and numbered cause pending before the court.

The Court, after having read the pleadings, is of the opinion that said Motion should be in all things GRANTED.

It is therefore ORDERED that BRANDON PLAGENS, Private Investigator, be appointed by the Court as the investigator for the Defendant.

It is also ORDERED that all law enforcement agencies within The State of Texas permit and extend the same courtesy and access afforded defense attorneys, to BRANDON PLAGENS, Private Investigator, for purposes of conducting interviews of the Defendant and all witnesses that may be held in law enforcement custody. Specifically, it is further ordered that the Harris County Sheriff's Office allow access to **TORREY LEON**, with a **SPN 02859740** with a Date of Birth of **09/08/1997**, and that the Harris County Sheriff's Office allow the private investigator, BRANDON PLAGENS, PI LIC# A-07292901, named herein to enter the Harris County Jail with a laptop computer, printer and an audio recording device when visiting the defendant.

It is further ORDERED that BRANDON PLAGENS, Private Investigator, after conclusion of his investigation and tendering his statement, shall be directly monetarily compensated by the Treasurer of Harris County, Texas for his services.

Funding for Investigator is granted in the amount of \$ 600.00.

Signed and entered this \_\_\_\_\_ day of \_\_\_\_\_, 2019.



HONORABLE CHUCK SILVERMAN

183<sup>RD</sup> Judicial District Court

of Harris County, Texas