

THE STATE OF TEXAS
VS.

ROMAN ERIC CHAPA
701 EDWARDS BLVD
BIG SPRING, TX 79720

01850206

SPN:
DOB: WM 06/18/71
DATE PREPARED: 3/18/2015

D.A. LOG NUMBER: 2146104
CJIS TRACKING NO.:
BY: JN DA NO: 002674294
AGENCY: DPS
O/R NO: X2C3150007
ARREST DATE: TO BE

NCIC CODE: 399901

RELATED CASES:

FELONY CHARGE: FALSE STATEMENTS (RACING ACT)

CAUSE NO:

HARRIS COUNTY DISTRICT COURT NO:

FIRST SETTING DATE:

1461465

176

BAIL: \$NO BOND
PRIOR CAUSE NO:

FILED
Chris Daniel
District Clerk

MAR 18 2015

Harris County, Texas
Deputy
Time: 4:15 PM

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

Before me, the undersigned Assistant District Attorney of Harris County, Texas, this day appeared the undersigned affiant, who under oath says that he has good reason to believe and does believe that in Harris County, Texas, **ROMAN ERIC CHAPA** hereafter styled the Defendant, heretofore on or about **JANUARY 19, 2015**, did then and there unlawfully intentionally and knowingly make a false statement to J. GREEN, a peace officer and Agent employed by the Texas Department of Public Safety, namely, the defendant stated to J. GREEN that the defendant did not contact J. COADY after the horse race on JANUARY 17, 2015, while J. GREEN was conducting an investigation under the TEXAS RACING ACT, and the defendant's statement was material to that investigation.

PROBABLE CAUSE

Affiant, Jeffrey Green, a credible and reliable certified Peace Officer employed by the Texas Department of Public Safety, has reason to believe, and does believe that on or about January 19, 2015, in Harris County, Texas, Roman Eric Chapa, hereafter the Defendant, committed the state jail felony offense of Making a False Statement under Sec. 14.06 of the Texas Racing Act at 7575 North Sam Houston Parkway West, Houston, Harris County, Texas.

Affiant's belief is based upon the following:

Affiant, Jeffrey Green, was assigned to investigate the allegation that Roman Chapa unlawfully influenced a horse race, namely, the 9th race of the "Richard King Turf Stakes" held at Sam Houston Race Park located at 7575 North Sam Houston Parkway West, Houston, Harris County, Texas.

Affiant has reviewed Section 14.06 of the Texas Racing Act, which reads as follows:

Texas Racing Act
Sec. 14.06. False Statements

(a) A person commits an offense if the person knowingly makes a material and false, incorrect, or deceptive statement to another who is conducting an investigation or exercising discretion under this Act or a rule adopted under this Act.

(b) In this section, the term "statement" means a representation of fact and includes:

- (1) a written or oral statement; or
- (2) a sworn or unsworn statement.

(c) An offense under this section is a state jail felony unless the statement was material in a commission action relating to a racetrack license, in which event the offense is a felony of the third degree.


Affiant, on January 19, 2015, along with Texas Racing Commission Investigator Melvin Bell and the Director of Security at Sam Houston Race Park, Donald Ahrens, conducted an audio recorded non-custodial interview with jockey Roman Chapa regarding allegations that he used a prohibited device (an electrical shocking device) on the horse he rode named Quiet Acceleration during the 9th race of the Richard King Turf Stakes that had been held on January 17, 2015 at the Sam Houston Race Park in Harris County, Texas. This interview was conducted at the Sam Houston Race Park located at 7575 North Sam Houston Parkway West, in Houston Harris County, Texas. Affiant was present for this interview and recorded it. At the beginning of the interview, Roman Chapa identified himself and provided residential information along with his cell phone number. Chapa identified his cell phone number as (210) 557-8548. During the interview, Investigator Melvin Bell asked Roman Chapa if he contacted Sam Houston Race Park Photographer Jack Coady regarding a photo that Coady had taken of that same race and posted on the racetrack website which depicted Roman Chapa holding a prohibited device in his left hand. Roman Chapa stated to Investigator Bell that he did not contact Photographer Jack Coady regarding the photograph. Investigator Bell then asked Roman Chapa if he had any contact with Photographer Jack Coady either by voice or by text messaging using his cell phone. Roman Chapa stated that he never contacted Photographer Jack Coady either by voice or by text messaging. As the interview progressed, Roman Chapa was again asked if he had ever contacted Photographer Jack Coady regarding a photo that Coady had taken of Roman Chapa. Jockey Roman Chapa again denied ever making any type of contact with Photographer Jack Coady.

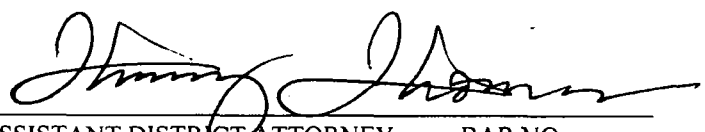
Affiant and Investigator Melvin Bell then made contact with Photographer Jack Coady and interviewed him. Photographer Jack Coady stated that Roman Chapa contacted him several times via phone regarding the photo that he took during the 9th race of the Richard King Turf Stakes. Jack Coady voluntarily provided his phone to Affiant who observed that on Sunday January 18, 2015 at 12:37 AM there was a missed call from Roman Chapa from the number (210) 557-8548 and an additional missed call from Roman Chapa from the number (210) 557-8548 on January 18, 2015 at 12:42 AM. Phone records that were obtained from Jack Coady's phone indicate that Photographer Jack Coady returned Roman Chapa's call on January 18, 2015 at 12:52 AM and Jack Coady and Roman Chapa spoke for 3 minutes and 53 seconds. Jack Coady told Affiant and Investigator Bell that Roman Chapa wanted him to take the photograph off the Sam Houston Race Park website and that he claimed that the photo was a bad photo. The phone records further indicate that Roman Chapa also texted Photographer Jack Coady regarding the photograph multiple times. Affiant has viewed the records that indicate that on January 18, 2015 at 12:37 AM, Roman Chapa from the number (210) 557-8548 texted Jack Coady's phone and stated, "Hey jack this is Roman can you please give me a call as soon as possible very very important bye." Records also indicate that Roman Chapa again texted Jack Coady's phone from the number (210) 557-8548 on January 18, 2015 at 12:38 AM and stated, "Jack this Roman please call me asap." Investigators were also able to view Jack Coady's phone and observed that Roman Chapa again contacted Jack Coady and sent a text stating, "Fukk its in the website try to get it off". This final text was sent along with the photograph that Jack Coady took of Roman Chapa depicting the prohibited device during the race.

The purpose of the above investigation was to determine whether or not Roman Chapa intentionally or knowingly used an electrical shocking device designed to increase the speed of and unnaturally stimulate and excite a race animal, namely a race horse named Quiet Acceleration. The information as to whether or not contact was made by Roman Chapa to Sam Houston Race Park Photographer Jack Coady was highly probative and relevant, and therefore material, to this investigation as it concerned Chapa's attempt to conceal the evidence of his crime. It is clear from the evidence that Roman Chapa was untruthful about his telephone contact with Photographer Jack Coady when he denied such contact to Agent Affiant and Texas Racing Commission Investigator Melvin Bell.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Sworn to and subscribed before me on **March 18, 2015**

Affiant 


ASSISTANT DISTRICT ATTORNEY BAR NO.
OF HARRIS COUNTY, TEXAS.

COMPLAINT

COPY OF COMPLAINT/WARRANT DELIVERED TO

Officer's name: Jeffrey Green

Police agency: OPC

~~Phone No.~~ date/time: 03/18/15 5:00AM

Unofficial Copy Office of Chris Daniel District Clerk