

THE STATE OF TEXAS
VS.
KEITH DANIEL LANKFORD
1026 ROMAINE
HOUSTON, TX 77090

03010294

SPN: 03010294
DOB: W M 6/1/1964
DATE PREPARED: 7/30/2019

D.A. LOG NUMBER: 2557766
CJIS TRACKING NO.:
BY: JL DA NO: 69051500
AGENCY:SHF
O/R NO: 190710658
ARREST DATE: TO BE

NCIC CODE: 1301 19
FELONY CHARGE: **Aggravated Assault**

RELATED CASES:

CAUSE NO:
HARRIS COUNTY DISTRICT COURT NO: **1640674**
FIRST SETTING DATE: **337**

BAIL: TO BE SET AT MAGISTRATE
PRIOR CAUSE NO:
CHARGE SEQ NUM: 1

FILED
Barilyn Burgess
District Clerk

JUL 30 2019
7:30:19
Harris County, Texas

By: *[Signature]*
Deputy

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, **KEITH DANIEL LANKFORD**, hereafter styled the Defendant, heretofore on or about **July 30, 2019**, did then and there unlawfully, intentionally and knowingly threaten Robert Midcap with imminent bodily injury by using and exhibiting a deadly weapon, namely, a nail gun.

PROBABLE CAUSE:

I, A. MUNOZ, am a peace officer employed with the Harris County Sheriff Office, and I believe and have reason to believe that KEITH LANKFORD, a white male, born on June 1, 1964, committed the offense of AGGRAVATED ASSAULT WITH DEADLY WEAPON on or about July 30, 2019 in Harris County, Texas.

I BASE MY BELIEF ON THE FOLLOWING FACTS:

I met with ROBERT MIDCAP, who is a security coordinator for the Home Owners Association (HOA), hereinafter the Complainant. Based on the Complainant and my observations, I found him to be both credible and reliable. The Complainant told me that he needed to do a forced mow at 1026 Romaine, Harris County, Texas, due to the home owner, who was later identified as KEITH LANKFORD, hereinafter the Defendant, failing to mow his lawn after numerous certified letters sent to his residence. The Complainant requested that on July 30, 2019, I accompany him to the above-mentioned residence to conduct the forced mow, because the Defendant has a sign outside stating that trespassers will be killed to the best of his ability.

On July 30, 2019 I met with the Complainant at 1026 Romaine Lane, and while the Complainant was conducting the forced mow at the Defendant's residence, I observed the Defendant open a window, point a nail gun at the Complainant and began shooting, causing it to strike the Complainant. I observed a laceration on the Complainant's right arm. The Complainant told me that he felt pain. In my training and experience, an altered nail gun used in the manner and means herein is capable of causing serious bodily injury or death.

The Complainant provided me the Defendant's full name. The Affiant knows the Defendant from prior calls by name and date of birth. The Defendant has been identified on numerous occasions for mental health issues.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

Sworn to and subscribed before me on July 30, 2019

[Signature]

AFFIANT

[Signature]

ASSISTANT DISTRICT ATTORNEY
OF HARRIS COUNTY, TEXAS
Bar No. **24105792**

COMPLAINT

COPY OF COMPLAINT/WARRANT DELIVERED TO

Officer's name: A. Munoz

Police agency: HCSO

Phone no: _____ date/time: 7-30-19/1818

OL



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this January 13, 2020

Certified Document Number: 86417266 Total Pages: 2

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com