

THE STATE OF TEXAS

§

DOCKET #

COUNTY OF NUECES

§

COURT:

### **AFFIDAVIT FOR SEARCH WARRANT**

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED THE AFFIANT HEREIN, A PEACE OFFICER UNDER THE LAWS OF TEXAS, WHO, BEING DULY SWORN, ON OATH MADE THE FOLLOWING STATEMENTS:

My name is Dana Richardson; I am a certified Texas Peace Officer with 21 years of law enforcement experience. I am employed by the Nueces County District Attorney's Office as a Criminal Investigator. I have conducted numerous investigations involving criminal acts in violation of the Texas Penal Code, Health and Safety Code. I have assisted local, state and federal agencies with the execution of State and Federal search warrants. I have attended numerous trainings and have personally experienced a variety of different methods of investigation for crimes against persons. I have also conducted interviews of suspected parties, witnesses, and victims that are subject to investigations involving crimes violating the Texas Penal Code and the Health and Safety Code. I have consulted with other law enforcement officers and investigators who have participated in similar investigations and activities.

I have learned from my training and experience of investigating crimes against persons and executing search warrants that persons routinely keep the following instruments and instrumentalities of offenses:

- 1. Any and all written or printed work product, including but not limited to, reports, findings, examinations, notes, files, papers, records, documents, photographs, certificates, created by, recorded by, prepared by, held by or prepared on behalf of Sandra Lyden, while employed as a Deputy Chief Medical Examiner for Nueces County or being considered for employment by Nueces County. This includes, but is not limited to, any and all findings authored by Deputy Chief Medical Examiner Sandra Lyden or co-signed or co-authored by Deputy Chief Medical Examiner Sandra Lyden while employed at the Nueces County Medical Examiner's Office or being considered for employment by Nueces County;**
- 2. Documents, logs, notes, records, papers, reports, medical files, death certificates and any other written or printed material containing information related to any autopsies or any medical opinions, or any medical diagnosis, or any medical evaluations that Deputy Chief Medical Examiner Sandra Lyden has performed while employed as a Deputy Chief Medical Examiner for Nueces County or being considered for employment by Nueces County.**

Said property constitutes evidence that the offense described in the paragraph below, was committed and identify the actor or actors who committed the offense.

**AFFIANT HAS PROBABLE CAUSE FOR SAID BELIEF BY REASON OF THE FOLLOWING FACTS AND CIRCUMSTANCES:**

I reviewed CCPD offense report number \_\_\_\_\_ and said report indicates that on the morning of January 3, 2022, Corpus Christi Police Officers responded to \_\_\_\_\_ in Corpus Christi, Texas for an adult female (\_\_\_\_\_) who was not breathing. The report indicated \_\_\_\_\_ was transported to the hospital where she was declared deceased. The report further indicated that the \_\_\_\_\_ was taken to the Nueces County Medical Examiner's Office. Corpus Christi Police Detective Jason Smith was assigned to investigate the case and stated he received a written preliminary autopsy report from Deputy Chief Medical Examiner Sandra Lyden, M.D. that documented the following:

Decedent Name: \_\_\_\_\_ Case Number: \_\_\_\_\_ Location: Nueces County Medical Examiner's Office Corpus Christi, Texas. Date: January 3, 2022. Time: 11:10

FINDINGS: "Based on the autopsy and the history available to me, it is my opinion that the cause of death of this 27-year old white female died as a result of blunt force injuries."

I was informed that Detective Smith in furtherance of the ongoing criminal investigation stated he talked to Dr. Lyden who advised him the decedent had a C6/C7 neck fracture that caused the decedent's death and was preliminarily ruling the death a "homicide". Detective Smith stated he asked Dr. Lyden questions about her medical findings and medical diagnosis of the injuries and she was not able to give a proper explanation for her medical opinions.

Detective Smith conferred with the Nueces County District Attorney's Office and a decision was made to seek a second opinion related to the medical diagnosis and medical findings of Dr. Lyden with regard to the death of \_\_\_\_\_ for purposes of the criminal investigation.

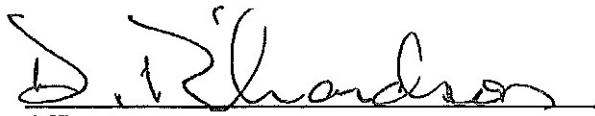
The Nueces County District Attorney's Office had the decedent transported to Georgetown, Texas for an independent autopsy. The autopsy was performed by Dr. Chundru who stated the cause of death was not a homicide. Dr. Chundru stated the manner of death was natural causes.

During the course of the criminal investigation of the death of \_\_\_\_\_, credible information was received from the State of Texas Medical Board that Dr. Sandra Lyden does not possess a license to practice medicine in Texas, nor does Dr. Sandra Lyden possess a Texas temporary emergency permit to practice medicine in Texas. During the course of the criminal investigation of the death of \_\_\_\_\_, Dr. Sandra Lyden admitted to Detective Jason Smith that she performed the autopsy on \_\_\_\_\_ and that she was making the medical findings, diagnosis, and evaluation on the injuries sustained by \_\_\_\_\_ and was further making the medical diagnosis and medial finding on the cause of death of \_\_\_\_\_. Dr. Adel Shaker confirmed the medical findings, medical diagnosis and cause of death made by Dr. Sandra Lyden to Detective Jason Smith stating he was present when the autopsy was performed and he agreed with her assessment, her diagnosis and her findings.

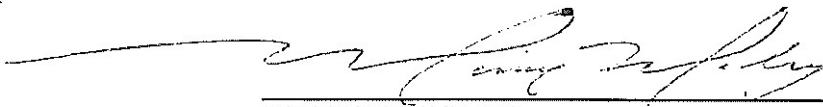
I reviewed Nueces County Personnel records of Sandra Lyden. These records document Sandra Lyden was hired as a Deputy Chief Medical Examiner on 12-06-2021. These Records further indicate that Dr. Adel Shaker knew Sandra Lyden was not licensed to practice medicine in the State of Texas and that Dr. Lyden needed to obtain an Emergency Visiting Practitioner Temporary Permit to perform the duties of a Deputy Chief Medical Examiner. Upon investigation the Texas Medical Board stated Sandra Lyden is not licensed to practice medicine in the State of Texas and they could not locate Sandra Lyden or Adel Shaker for Emergency Visiting Practitioner Temporary Permits.

It is my belief that a search of the suspected business will result in collecting physical evidence and property or items constituting evidence of an offense or constituting evidence tending to show that a particular person or persons committed the offense of Practicing Medicine without a License, I pray that the court issue such warrant in order to obtain evidence in this offense.

Wherefore, I ask for issuance of a warrant that will authorize the search of said suspected business and search same for the property described above and seize the property if found.

  
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT ON THIS THE  
14<sup>th</sup> DAY OF January, 2022

  
DISTRICT JUDGE