

THE STATE OF TEXAS § DOCKET # _____

COUNTY OF GUADALUPE § COURT: _____

COMPLAINT

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 AND ACCUSATIONS:

My name is **David Schroeder** and I am commissioned as a peace officer by the City of NEW BRAUNFELS POLICE DEPARTMENT. I hereby state upon my oath that I have reason to believe and do believe that heretofore, and before the making and filing of this Complaint, that

Jennifer Marie Coryell
DOB: 03/27/1973 White Female, 5'07" Brown Hair, Hazel Eyes
Last Known Address: 2434 Dove Crossing Drive
New Braunfels, Texas, 78130
57 Mission Drive
New Braunfels, Texas 78130

on or about the 27th, day of March, 2016, in Guadalupe County, Texas did then and there intentionally and knowingly cause the death of an individual, namely, Felix Antonio Nieves, by shooting Felix Antonio Nieves with a 12 Gauge Double Barrel Shotgun.

My probable cause for said belief and accusation is as follows:

On 03/27/16, at approximately 0716 Hrs, Officers with the New Braunfels Police Department were dispatched to 2434 Dove Crossing located in the City of New Braunfels, Guadalupe County Texas. A 911 phone call was received and Officers were dispatched to said location for a disturbance which resulted in a shooting. Initial statements to NBPD dispatch stated the victim was shot in the stomach with a double barrel shotgun.

Officers with the New Braunfels Police Department immediately responded to the address and noticed George Coryell and Jennifer Coryell at the location along with two small children. Officers also located a deceased male at the top of the staircase inside of the home with signs on gunshot wounds to the body.

It was learned by officers who were on scene through initial interviews of Mr. Coryell and Mrs. Coryell that the deceased male is their 17 year old son, Felix

Antonio Nieves. It was also learned by Officers that Mr. Coryell shot Felix with a double barrel shotgun. Officers stated they were advised that a disturbance had occurred prior to the police being called where a baseball bat and taser was used. During this confrontation, Mr. Coryell proceeded downstairs in the home and retrieved a shotgun. As Mr. Coryell was coming to the bottom of the staircase, he then noticed Felix coming out of the bedroom located at the top of the staircase. Officers stated Coryell then fired the shotgun killing him. Officers also located two small children within the residence who were unharmed during the incident.

Jennifer Coryell was then interviewed at the Police Department. During her interview with Detective Groff and Detective Schroeder, Jennifer stated that on 03-27-16 Felix became upset with her due to the fact she woke him up in the morning for Church services. At this time Jennifer indicated Felix struck her with a small souvenir style baseball bat. Jennifer stated Felix then followed her into her bedroom and she grabbed her taser. Felix then took the taser away from her and began to use it on her. Jennifer stated Felix stopped and she heard yelling and then heard two gun shots being fired. Jennifer stated she then walked down the stairs and observed George holding a double barreled shotgun.

NOTE: During the interview with Jennifer she told detectives George has recordings on their cell phone of Felix being aggressive. They provided detectives their phone with consent to search it to retrieve said recordings.

George was then interviewed at the Police Department at this time. During this interview George stated on 03-27-16, Jennifer walked into their bedroom telling George she needed her taser. George stated Felix then entered the room as Jennifer tried to tase Felix one time. George stated he witnessed Felix take the taser away and then used the taser on Jennifer. George stated he then ran downstairs to retrieve a double barreled shotgun from the closet. George stated he then ran back up the stairs towards the master bedroom. George stated as he was halfway up the stairs he observed Felix exit the master bedroom door unarmed with nothing in his hands. George stated he instantly fired, killing Felix.

During the investigation George advised detectives that he observed Felix break the baseball bat UPSTAIRS before he was shot and killed. However, it was learned from the crime scene investigation the base baseball bat was broken into two pieces with the handle of the bat located UPSTAIRS in the master bedroom and the second piece of the bat was located DOWNSTAIRS on the backside of a magazine rack located in the living room. Based on the facts of the case the bat had been tampered with prior to police arrival.

Based on the information at that time George was arrested for murder and transported to the Guadalupe County Jail.

The Coryell's two younger children were then forensically interviewed.

In the days following, the forensic interviews were reviewed. It was learned from the interviews that the two children had a different version of what happened leading up and to the day of the incident and **DIFFERED** greatly from Jennifer Coryell's and George Coryell's account of what happened.

They stated Jennifer Coryell woke up that morning yelling profanity at them to get up and get ready for church. The children stated their mother was specifically calling them FAGGOTS over and over yelling at them they need to get ready for church. The children stated Jennifer Coryell also had a small wooden baseball bat threatening to strike them if they did not get ready for church and again calling everybody FAGGOTS. The children stated their brother, Felix Nieves, came downstairs to protect them and he took the baseball bat away from their mother and told her to quit calling everybody a FAGGOT. The children stated Felix DID NOT hit their mother with the baseball bat. Once the baseball bat was taken away, Jennifer Coryell told Felix she was going to get her taser and she was going to tase his ass and the children. The children stated they hid in their bedrooms and as they continued to hear yelling and screaming. One child then specifically heard Jennifer Coryell, directing George Coryell to kill Felix...stating he heard Jennifer tell George to "SHOOT HIM!" The children then heard two shots fired and saw Felix on the floor dead. The children ran to their rooms' scared thinking their mother was going to direct George to kill them next. The children stated the cause of the disturbance was all their mother's fault and she was the devil of the house.

During this investigation Detective Tovar was able to conduct a forensic search on the cellular phone provided by the Coryells'. Once the search was completed I was able to review the Forensic Report. During my review I found several voice recordings on the phone depicting arguments between Jennifer, George and Felix. These recordings clearly showed that Jennifer was belligerent, abusive and hostile towards Felix. In these recordings Jennifer is heard belittling Felix over and over. The recording revealed Jennifer was continuously trying to instigate a physical altercation with Felix by name calling and telling Felix to hit her. Also, the recordings revealed George tried to stop Jennifer from antagonizing Felix and was aware of what she was doing to Felix. It was obvious Felix was in a very hostile and antagonizing home atmosphere in the weeks/months leading up to his death.

During this investigation, I was able to interview several of Felix's friends. During these interviews some of his close friends stated Felix had confided in them that he continually gets into fights with Jennifer due to the fact she is always intoxicated. One friend stated Felix showed him a text message on his cellular phone where George was threatening to kill him.

Jennifer is thus a party to the offense of Murder due to the fact she acted with the intent to promote the commission of the offense by starting the physical altercation with Felix and the other children in the house. Once Jennifer started the altercation she then directed/encouraged George to shoot and kill her son Felix Antonio Nieves.

Affiant therefore believes that probable cause does exist to issue a warrant for the arrest of **Jennifer Marie Coryell** for the offense of **Murder** under Texas Penal Code 19.02

Complainant

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID
AFFIANT/COMPLAINANT ON THIS THE _____ DAY OF _____,
2016.

MAGISTRATE,
GUADALUPE COUNTY, TEXAS