

IN THE MATTER of Section 198 of the Summary Proceedings Act 1957

AND
IN THE MATTER of an application for a Search Warrant in respect of the said building, carriage, vehicle, box, receptacle, premises or place situated at 404 Hereford Street, Christchurch

¹ Describe briefly the building, aircraft, ship, carriage, vehicle, box receptacle, premises or place.

TO:

of

District Court Judge, Justice, Registrar²

I, Robin Alistrair NICHOLL of CHRISTCHURCH

(Constable, Detective, Sergeant, etc.)

make oath and say as follows:³

² Delete those not applicable

³ Set out in numbered paragraphs as fully as is practicable the matters upon which the District Court Judge, Justice or Registrar may satisfy himself that there is reasonable ground for believing that there is in the specified place any thing which comes within s.198(1)(a), (b) or (c).

- 1 In November 1991, the Christchurch Child Abuse Unit began investigating allegations of sexual abuse at the Christchurch Civic Child Care Centre.
- 2 The suspect in this enquiry was a man who worked at the centre and had been employed there since 1987. He is Peter Hugh McGregor ELLIS. He resides at 70 Tancred Street, Christchurch.
- 3 ELLIS was arrested in early April 1992 and to date has been charged with representative offences against eight children. These offences occurred while at the centre or other locations while in the care of ELLIS.
- 4 Charges range from indecent touching to full anal intercourse with a child as young as four years. The offences in relation to this are indecent assault, inducing an indecent act, sexual violation. All offences are punishable by imprisonment.
- 5 Difficulty investigating this sort of allegation is that the children at the centre range in age of 18 months to five years. This causes the Police to be very careful about the way the children are interviewed and consequently takes some time.
- 6 Of the children who had disclosed ^{abuse} by ELLIS away from the creche, one child, [REDACTED], has clearly disclosed abuse at his house.
- 7 It has been confirmed by [REDACTED] mother, [REDACTED] that Peter ELLIS baby-sat [REDACTED] at a house he was living in at the time in Hereford Street.
- 8 ELLIS was interviewed in relation to offences disclosed by [REDACTED] on 8 June 1992. He confirmed that he had baby-sat [REDACTED] at 404 Hereford Street but denied abusing her.
- 9 Other children have disclosed abuse at an unknown house which has been described by them as having an upstairs.

RM

- 10 404 Hereford Street is a large two storey house. It is occupied by ~~John~~ ~~Ellis~~. He is not known to Police.
- 11 Children have variously described the activities that have taken place at this unknown location as having their photograph taken, playing with dolls and having a bath with ELLIS. They have also disclosed abuse by a person other than ELLIS at this address.
- 12 A warrant is therefore sought to enable Police to enter 404 Hereford Street and to search for dolls, photographs or other evidence indicating the premises may have been used to commit offences of child abuse and also to allow Police to photograph the premises.

I THEREFORE APPLY for a search warrant to be issued in

respect of the said⁴ building, carriage, vehicle, box, receptacle, premises or place situated at 404 Hereford Street, Christchurch.

R. Mitchell

SWORN at CHRISTCHURCH

this 16 day of June 1992

before me:

[Signature]
District Court Judge, Justice, Registrar
Dep.

Building, aircraft, ship,
etc.

[Signature]

16/6/92 2 45 PM