STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR
CRIMINAL COURT 5
CRIMINAL DIVISION, ROOM W305

STATE OF INDIANA)
)
vs.)
)

LARRY JO TAYLOR JR.
B/M
DOB 2/10/1997

Cause No: 49G05-1511-MR-041732

INFORMATION
COUNT I
MURDER
I.C. 35-42-1-1(1)
A FELONY
COUNT II
MURDER
I.C. 35-42-1-1(2)
A FELONY
COUNT III
MURDER
I.C. 35-42-1-1(2)
A FELONY
COUNT IV
BURGLARY
I.C. 35-43-2-1
A LEVEL 1 FELONY
COUNT V
THEFT
I.C. 35-43-4-2(a)
A LEVEL 6 FELONY
COUNT VI
ROBBERY RESULTING IN SERIOUS
BODILY INJURY
I.C. 35-42-5-1(1)
A LEVEL 2 FELONY
COUNT VII
CRIMINAL CONFINEMENT
I.C. 35-42-3-3(a)
A LEVEL 3 FELONY
COUNT VIII
BURGLARY
I.C. 35-43-2-1
A LEVEL 4 FELONY
COUNT IX
THEFT
I.C. 35-43-4-2(a)

A LEVEL 6 FELONY
COUNT X
AUTO THEFT
I.C. 35-43-4-2.5(b)(1)
A LEVEL 6 FELONY
COUNT XI
BURGLARY
I.C. 35-43-2-1
A LEVEL 4 FELONY
COUNT XII
THEFT
I.C. 35-43-4-2(a)
A LEVEL 6 FELONY
COUNT XIII
CARRYING A HANDGUN WITHOUT A LICENSE
I.C. 35-47-2-1
A CLASS A MISDEMEANOR

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly or intentionally kill another human being, to-wit: Amanda Blackburn;

COUNT II

On or about November 10, 2015, LARRY JO TAYLOR Jr., did kill another human being, to wit: Amanda Blackburn; while committing or attempting to commit the offense of Burglary, to wit: killed Amanda Blackburn after breaking and entering her residence with the intent to commit a felony therein, to wit: theft;

COUNT III

On or about November 10, 2015, LARRY JO TAYLOR Jr., did kill another human being, to wit: Amanda Blackburn; while committing or attempting to commit the offense of Robbery, to wit: killed Amanda Blackburn while taking property from her person or presence by using or threatening the use of

force;

COUNT IV

On or about November 10, 2015, LARRY JO TAYLOR Jr. did break and enter the dwelling of David and Amanda Blackburn, to-wit: their residence at [redacted] Sunnyfield Ct.; with the intent to commit a felony therein, to-wit: theft; said act resulting in serious bodily injury to Amanda Blackburn, to-wit: gunshot wounds;

COUNT V

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly exert unauthorized control over the property of David and/or Amanda Blackburn, to-wit: a blue bag containing a Macbook Pro and books with the intent to deprive David and/or Amanda Blackburn of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

COUNT VI

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly take property, to-wit: bank cards from another person or the presence of another person, to-wit: Amanda Blackburn, by using force or by threatening the use of force, to-wit: by striking Amanda Blackburn and/or by threatening Amanda Blackburn with a deadly weapon; said act resulting in serious bodily injury to Amanda Blackburn, to-wit: gunshots wounds;

COUNT VII

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly confine Amanda Blackburn without the consent of Amanda Blackburn, said LARRY JO TAYLOR Jr. being armed with a deadly weapon, to wit: a gun;

COUNT VIII

On or about November 10, 2015, LARRY JO TAYLOR Jr. did break and enter the dwelling of [redacted]

[redacted], to-wit: her residential apartment at [redacted] San Clemente Dr.; with the intent to commit a felony therein, to wit: theft;

COUNT IX

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly exert unauthorized control over the property of [redacted], to-wit: a Macbook Pro, an IPhone, a wallet with contents and car keys with the intent to deprive [redacted] of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

COUNT X

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly exert unauthorized control over the motor vehicle of [redacted], to-wit: a Chrysler Sebring; with the intent to deprive the person of the vehicle's value or use;

COUNT XI

On or about November 10, 2015, LARRY JO TAYLOR Jr. did break and enter the dwelling of [redacted], to-wit: her residence at [redacted] Sunnyfield Ct.; with the intent to commit a felony therein, to-wit: theft;

COUNT XII

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly exert unauthorized control over the property of [redacted], to-wit: televisions, a laptop computer, a pearl necklace, sheets, a bag of oranges, a pink sweater, and a remote control with the intent to deprive [redacted] of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

COUNT XIII

On or about November 10, 2015, LARRY JO TAYLOR Jr. did knowingly carry a handgun in a

vehicle or on or about his person, without being licensed as required by law;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44-2-1 that the foregoing representations are true.

Affiant

November 23, 2015
Date

TERRY R. CURRY
Marion County Prosecutor
19th Judicial Circuit

Deputy Prosecuting Attorney

State's Witnesses:

[redacted]

[redacted]

STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT
CRIMINAL COUET 5
CRIMINAL DIVISION, ROOM W305

THE STATE OF INDIANA)
)
vs.)
)
LARRY JO TAYLOR JR.
B/M
DOB 2/10/1997

INFORMATION

SENTENCE ENHANCEMENT
USE OF A FIREARM, I.C. 35-50-2-11

CAUSE NO. 49G051511MR041732

On this date, Detective Thomas Lehn came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT XIV

Larry Jo Taylor, Jr., on or about November 10, 2015, did knowingly use a firearm in the commission of a felony under IC 35-42 that resulted in death, to wit: murder, in violation of IC 35-42-1-1;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44-2-1 that the foregoing representations are true.

Affiant

11/23/2015
Date

TERRY R. CURRY
Marion County Prosecutor
19th Judicial Circuit

Deputy Prosecuting Attorney

STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR
CRIMINAL COURT 5
CRIMINAL DIVISION, ROOM W305

STATE OF INDIANA)
)
vs.)
)

Cause No: 49G05-1511-MR-041745

JALEN E WATSON
B/M
DOB 4/12/1994

INFORMATION
COUNT I
MURDER
I.C. 35-42-1-1(2)
A FELONY
COUNT II
MURDER
I.C. 35-42-1-1(2)
A FELONY
COUNT III
BURGLARY
I.C. 35-43-2-1
A LEVEL 1 FELONY
COUNT IV
THEFT
I.C. 35-43-4-2(a)
A LEVEL 6 FELONY
COUNT V
ROBBERY RESULTING IN SERIOUS
BODILY INJURY
I.C. 35-42-5-1(1)
A LEVEL 2 FELONY
COUNT VI
BURGLARY
I.C. 35-43-2-1
A LEVEL 4 FELONY
COUNT VII
THEFT
I.C. 35-43-4-2(a)
A LEVEL 6 FELONY
COUNT VIII
AUTO THEFT
I.C. 35-43-4-2.5(b)(1)
A LEVEL 6 FELONY
COUNT IX
BURGLARY
I.C. 35-43-2-1

A LEVEL 4 FELONY
COUNT X
THEFT
I.C. 35-43-4-2(a)
A LEVEL 6 FELONY

On this date, the undersigned came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

On or about November 10, 2015, JALEN E WATSON, did kill another human being, to wit: Amanda Blackburn; while committing or attempting to commit the offense of Burglary, to wit: Amanda Blackburn was shot and killed after Watson and/or a co-defendant broke into and entered her residence with the intent to commit a felony therein, to wit: theft;

COUNT II

On or about November 10, 2015, JALEN E WATSON, did kill another human being, to wit: Amanda Blackburn; while committing or attempting to commit the offense of Robbery, to wit: Amanda Blackburn was shot and killed while Watson and/or a co-defendant took property from her person or presence by using or threatening the use of force;

COUNT III

On or about November 10, 2015, JALEN E WATSON did break and enter the dwelling of David and Amanda Blackburn, to-wit: their residence at [redacted] Sunnyfield Ct.; with the intent to commit a felony therein, to-wit: theft; said act resulting in serious bodily injury to Amanda Blackburn, to-wit: gunshot wounds;

COUNT IV

On or about November 10, 2015, JALEN E WATSON did knowingly exert unauthorized control over the property of David and/or Amanda Blackburn, to-wit: a blue bag containing a Macbook Pro and books with the intent to deprive David and/or Amanda Blackburn of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty

thousand dollars;

COUNT V

On or about November 10, 2015, JALEN E WATSON did knowingly take property, to-wit: bank cards from another person or the presence of another person, to-wit: Amanda Blackburn, by using force or by threatening the use of force, to-wit: by striking Amanda Blackburn and/or by threatening Amanda Blackburn with a deadly weapon; said act resulting in serious bodily injury to Amanda Blackburn, to-wit: gunshot wounds;

COUNT VI

On or about November 10, 2015, JALEN E WATSON did break and enter the dwelling of [redacted], to-wit: her residential apartment at [redacted] San Clemente Dr.; with the intent to commit a felony therein, to-wit: theft;

COUNT VII

On or about November 10, 2015, JALEN E WATSON did knowingly exert unauthorized control over the property of [redacted], to-wit: a Macbook Pro, an IPhone, a wallet with contents and car keys with the intent to deprive [redacted] of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

COUNT VIII

On or about November 10, 2015, JALEN E WATSON did knowingly exert unauthorized control over the motor vehicle of [redacted], to-wit: a Chrysler Sebring; with the intent to deprive the person of the vehicle's value or use;

COUNT IX

On or about November 10, 2015, JALEN E WATSON did break and enter the dwelling of [redacted] to-wit: her residence at [redacted] Sunnyfield Ct.; with the intent to commit a felony therein, to-wit: theft;

COUNT X

On or about November 10, 2015, JALEN E WATSON did knowingly exert unauthorized control over the property of [redacted], to-wit: televisions, a laptop computer, a pearl necklace, sheets, a bag of oranges, a pink sweater, and a remote control with the intent to deprive [redacted] of any part of the use or value of the property, said property having a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44-2-1 that the foregoing representations are true.

Affiant

November 23, 2015
Date

TERRY R. CURRY
Marion County Prosecutor
19th Judicial Circuit

Deputy Prosecuting Attorney

State's Witnesses:

[redacted]

https://marion.inpcms.org/

AFFIDAVIT
FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Thomas Lehn swears (affirms) that:

At 5:23 A.M., November 10th, 2015, [redacted] called 911 to report a burglary of her apartment at [redacted] San Clemente Drive. Officer Thomas Aguilar responded to make a report. [redacted] stated that she woke up at 4:30 A.M. and realized her cell phone was missing from her bedroom. She noticed her sliding glass door was open and plants were knocked over in the apartment. Her Apple MacBook laptop was missing along with her purse and keys. [redacted] noticed her silver 2007 Chrysler Sebring 4D, 2016 Indiana license plate number [redacted], VIN number [redacted], was missing from the parking lot. Officer Aguilar and [redacted] reviewed her [redacted] alarm system which takes interior still photographs when someone enters the residence. Three people were seen in the still photographs; two were definitely inside the residence and the third was either just inside or at the doorway to the apartment. Entry to the apartment was made by cutting the porch screen and entering the unlocked sliding door. The camera was disabled during the burglary.

At 8:17 A.M., November 10th, 2015, [redacted] called 911 to report a burglary of her home at [redacted] Sunnyfield Court. Officer Elise Torres responded to take the report. [redacted] interior video depicted a subject who disabled the system at 5:36 A.M. Entry was made to the

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

residence by tearing through the patio screen window and unlocking the dead bolt to the patio door. Four televisions, a MacBook Pro, a Tiffany Pearl necklace, a pink woman's sweater, an AT&T Uverse remote control, a bag of oranges, and bed sheets were taken from the home. It appeared the suspect(s) also drank beer and wine and left the bottles in the home. Exit was made through the front door which [redacted] discovered unlocked when she returned home. DNA swabs were taken by the Indianapolis-Marion County Forensic Services Agency from [redacted] Sunnyfield Court, including swabs from the beer can and wine bottle.

At 8:22 A.M., November 10th, 2015, David Blackburn called 911 reporting that he found his wife, Amanda Blackburn, injured and unconscious on the living room floor of their home at [redacted] Sunnyfield Court. Indianapolis Fire Department Engine 12 responded to the scene. At 8:30 A.M., IFD 12 requested the Indianapolis Metropolitan Police Department to respond for a possible assault. At 8:44 A.M., Officers Richard Crosby and Larry Crowe arrived as Medics were carting Amanda Blackburn from the home. Amanda Blackburn had sustained severe head trauma. Sergeant T. Michael Wilson and Officer Carl Grigsby cleared the residence. No one else was found in the home, except for Blackburn's year old son.

At 9:01 A.M., Detective Pete Perkins responded to Methodist hospital to investigate the nature of Amanda Blackburn's injuries. He learned Amanda Blackburn was actually shot in the head and was not expected to survive her injuries. She was also shot in the left lower arm and

I swear (affirm), under penalty of perjury as specified by IC 35-44.2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

had a possible gunshot wound to her upper left back. Perkins spoke with David Blackburn at Methodist. Blackburn said he left his home around 6:00 A.M. in his black 1997 Honda Civic to work out at L.A. Fitness [redacted] Blackburn stated that he left the front door unlocked when he left. He left the gym at approximately 7:10 A.M., and was talking on the phone with his friend, [redacted]. Blackburn stated that he remained on the phone on the way home and was still on the phone when he arrived home at approximately 7:30 A.M. He stayed on the phone in the driveway until he entered around 8:20 A.M. David Blackburn entered his home through the front door and found Amanda Blackburn face down in blood on the living room floor. She was nude with her panties next to her and her shirt pulled up as if someone tried to pull it off; however, it was not clear Blackburn had been sexually assaulted. Blackburn noticed her credit cards and wallet on the floor. He noticed her purse on the kitchen counter and a Swisher Sweet cigar package on the counter. David Blackburn stated that the Swisher Sweet package should not be in their residence. A decorative ladder and a lamp were knocked over in the living room next to Amanda Blackburn.

Detective Dan Kepler obtained a search warrant for [redacted] Sunnyfield Court. Crime Scene Specialist Colleen Clark documented the scene with the scene with video, photographs and a sketch. Clark recovered multiple blood and DNA swabs. She recovered change from the landing floor, gray panties, a roll of duct tape and earphones from the living room floor. She

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

recovered a Swisher Sweets package from the kitchen counter. Amanda Blackburn's purse and wallet were recovered from the counter. A bullet hole was later discovered in the base of the stairwell. A lead bullet was recovered from under the stairs.

I located Amanda Blackburn's cell phone next the bed in the master bedroom. At 7:53 A.M., Chase bank left a voicemail for Amanda Blackburn. The voicemail alerted Amanda to suspicious activity on her Chase debit card ending in 3667. Collen Clark reviewed the recovered bank cards and there was not a Chase debit card among them. Clark also processed the burglary scene at [redacted] Sunnyfield Court. The investigation also revealed that also taken from the residence was a Macbook Pro in a blue book bag with two books inside.

Detective Perkins, Sgt. Mark Prater, Lt. Roger Spurgeon, Captain Converse, Detective Rich Mahon, Lt. Craig McCartt, and Detective Kepler canvassed the area. They discovered video and witnesses who saw suspicious activity in the area.

Detective Perkins spoke with [redacted] who said he and his wife, [redacted], saw a person in all black with a hoody over his head in front of their trash at [redacted] Sunnyfield Court. The subject walked toward [redacted] Sunnyfield Court.

Sergeant Mark Prater spoke with [redacted]. Around 7:05 A.M., she was leaving [redacted] Sunnyfield Court. She noticed a male walking north from her court. He was wearing black shoes, pants, and a hoody. She drove from her residence and could see him walking on

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Detective Thomas Lehn

Sunmeadow Way. She noticed it was a black male talking loudly on his cell phone with his other hand in his pocket. The male also had a tee-shirt pulled up over his face.

Captain Craig Converse and Detective Dan Kepler met with [redacted]. At approximately 7:10-7:11 A.M., [redacted] was leaving [redacted] Sunmeadow Way. He saw a black male also wearing a hoody walking on Sunmeadow Way. The hoody was pulled tight and his hand was to his ear. [redacted] came back to his home instead of leaving. He saw the male walking east. A "like white late model Chrysler Sebring" drove east and stopped. The male got in the front passenger seat. The car backed in a driveway and drove west from Summerfield. [redacted] provided home video which captured what he saw.

Lieutenant Roger Spurgeon interviewed [redacted]. At approximately 6:40-6:45, she was in bed at [redacted] Sunnyfield Court. She heard two shots and what sounded like a woman scream.

Detective Rich Mahon met with [redacted] at [redacted] Sunnyfield Court. Baker provided video which documented activity on the street in front of his residence. Detective Mahon also retrieved video from the L.A. Fitness which confirmed David Blackburn's location and the timing of Blackburn at L.A. Fitness.

At 7:55 A.M., November 11th, 2015, Dr. Timothy Allender declared Amanda Blackburn legally dead.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Detective Thomas Lehn

At 10:28, P.M., November 11th, 2015, Officer Stephen Elliott was called to [redacted] Rookwood Avenue on the report of a located stolen Chrysler Sebring. The car was the silver 2007 Chrysler Sebring stolen in the burglary at [redacted] San Clemente Drive. I later interviewed a concerned citizen who stated that the Sebring appeared at that location between 7:30 A.M and 8:35 A.M. on November 10th, 2015.

At 10:00 A.M., November 12th, 2015, I attended the autopsy of Amanda Blackburn, a human being. Dr. [redacted] performed autopsy number [redacted]. He determined her cause of death was a gunshot wound to the head. The manner of death was ruled a homicide. Dr. [redacted] determined Blackburn had sustained a gunshot wound to the back of her head. She also had a gunshot wound to the lower left arm which traveled up to her biceps. She also had a through and through gunshot wound which entered and exited her upper back. The back wound was downward. Blackburn had scratches to her left cheek, a split lip and a lower tooth knocked out. Forensic Specialist Melissa Wilson recovered bullets from Blackburn's head and left biceps. She also obtained nail scrapings. An exam had previously been done at Methodist Hospital by Forensic Nurse [redacted]

The bullets recovered at autopsy were examined by Michael Putzek with the Indianapolis-Marion County Forensic Services Agency and were determined to be .38/9mm class. No shell casings were recovered which would be indicative of a revolver having been

I swear (affirm); under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

T. Lehn

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

used. This would also be consistent with a .38/.357. During the investigation, a photo was recovered from Larry Taylor's phone which was taken on September 19, 2015. Taylor is seen the photograph lying on a bed and next to him is a short barreled or snub nose revolver consistent with a .38 or .357.

At 10:45 A.M., November 12th, 2015, Detective Dan Kepler obtained consent to search the Chrysler Sebring from the owner, [redacted]. Colleen Clark processed the car. A Chase ATM receipt was found on the front passenger side floor. The receipt was a denied $500.00 transaction at 6:36 A.M., November 10th, 2015 at 6881 Michigan Road. The card number was [redacted], which matches Amanda Blackburn's missing debit card. There was a pink woman's sweater on the driver's side floorboard. There was an AT&T Uverse remote in trunk of the car. There was also a green men's XXL sweatshirt, a bed sheet and a bag of oranges in the trunk. [redacted] of [redacted] Sunnyfield Court later confirmed the pink sweater belonged to her. She said it was one of her favorite sweaters when she saw a photograph of it. Swabs were taken from the vehicle for potential DNA.

At 1:04 P.M., November 12th, 2015, Sergeant Eric Eads obtained subpoena results with photographs of ATM activity with Amanda Blackburn's Chase debit card. The stills depicted a person who appeared to be driving a silver Chrysler Sebring to the drive up at the Chase ATM at 6881 N. Michigan Rd. The subject had a pink shirt wrapped around his face and was wearing a

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

white hoody over his head. The subject was also wearing a dark vest. This was the failed transaction for $500.00 with Amanda Blackburn's debit card at 6:36 A.M., November 10th, 2015.

A second transaction occurred with Amanda Blackburn's Chase debit card at 1313 W. 86th St. at 6:54 A.M., November 10th, 2015. The same subject is on foot and successfully withdraws $400.00.

On November 17th, 2015, I was notified by Marion County Crime Lab Director Mike Medler of a CODIS hit. An area on the pink sweater, taken from an area identified by amylase mapping (a presumptive test for possible saliva), produced a male profile which was uploaded to CODIS. A CODIS hit returned to Jalen Watson, gallery number [redacted]. Neither [redacted] nor [redacted] knows Watson. Watson is currently on parole for burglary and the phone number he provided to parole was [redacted]-0802, which he claimed was his sister's number. Watson was found on Facebook and his one of his closest associates is Diano Gordon. Gordon is also on parole for burglary. Gordon provided phone numbers to parole of [redacted]-6567 and [redacted]-0147.

U.S. Marshal Liaison Sgt. Mark Hess obtained search a search warrant for Sprint records for phone number [redacted]-0802. He also obtained a search warrant for T-Mobile records for [redacted]-6567. In both cases the phone record searches authorized a review of phone calls made and received, as well as historical cell tower data. Hess reviewed the records for those

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Detective Thomas Lehn

numbers for the date November 10th, 2015. Sprint records indicated phone number [redacted]-0802 was in the area of E. 56th Street and I-465 during the time of the burglaries and the homicide. The tower is located where the original burglary occurred at [redacted] San Clemente. T-Mobile records indicated [redacted]-6567 was at the following locations on November 10th, 2015. At 4:40 A.M., the phone was at E. 56th Street and I465. The burglary at [redacted] San Clemente was at 4:36 A.M. It was calling [redacted]-0147, which is Gordon's second listed phone to parole. At 6:25 A.M., the phone moved to a tower at [redacted] Sunnyfield Court which was during the time of the homicide. At 6:39 A.M., it moved to a tower near 6881 N. Michigan Road which was immediately after the failed ATM transaction. At 6:54 A.M., the phone moved near 1313 W. 86th St. which was the location of the successful ATM transaction. The phone made five calls to [redacted]-3175 from the time of the initial burglary until after the successful ATM transaction. Hess obtained a search warrant for Verizon phone number [redacted]-7125. Records show that phone was at [redacted] Sunnyfield Court on November 10th, 2015 from 6:38 A.M. to 7:10 A.M. The phone only communicates with [redacted]-6567, which appears to move back toward the Sunnyfield address to pick up the person walking on Sunnyfield carrying [redacted]-7125.

Detective Kepler researched [redacted]-7125. He found the phone number in "Backpage" ads. The number was associated to [redacted] and Larry Taylor Jr. through police reports. Hess tracked the number to [redacted] S. Meridian St. Larry Taylor answered the door. He

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Detective Thomas Lehn

explained he didn't live there but he was sleeping on a pallet on the floor. He also told Hess the phone plugged in next to his pallet belonged to him and his phone number was [redacted]-7125.

Hess tracked cell phone number [redacted]-0802 to [redacted] Brendon Way West Drive, Apartment [redacted]. He located [redacted] in possession of the phone. [redacted] told Hess she knew Diano Gordon, Jalen Watson and Larry Taylor Jr. She said they left her apartment about 3:30 A.M., the morning of the shooting. She said there was a men's black vest (coat) in her closet which belongs to her boyfriend, but Jalen Watson often wore it. She showed Hess a pistol under her bed which either Jalen Watson or Diano Gordon left in her room. The Taurus 9MM pistol and the vest were later recovered via search warrant and consent from [redacted].

[redacted] was questioned by law enforcement and admitted that when Gordon, Watson and Taylor left his apartment shortly before the first burglary one of them was wearing his black Pelle-Pelle jacket. That jacket is consistent with a jacket observed worn by one of the suspects in the first burglary. It is also consistent with a jacket observed worn by the subject seen walking on Sunnyfield Court and Sunmeadow Drive who was picked up in the silver Chrysler Sebring.

On November 19, 2015, I interviewed Larry Taylor. Taylor waived his Miranda warnings. He said he left "The Cottages" with Diano Gordon and Jalen Watson. Taylor would only say that he "possibly" rode in the silver Chrysler Sebring to go 56th Street and Guion Road to go see someone named "Cheese". Taylor said he "possibly" stopped on Sunnyfield Court, but

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Detective Thomas Lehn

claimed he was so messed up he could not remember. Taylor stated he was able to remember he never exited the car until he made it to 56th and Guion Road.

On November 21st, 2015, I interviewed a cooperating individual. The CI said Larry Taylor, Jalen Watson and Diano Gordon left [redacted] apartment. Larry Taylor was carrying a snub nose .38 revolver and possibly wearing a Pelle Pelle jacket. They wanted money so Larry Taylor climbed up the back railing of an apartment in the Cottages. Taylor opened the front door for Gordon and Watson. Taylor had a set of keys in his hand. He worked the key fab and it opened a silver Chrysler Sebring. Taylor took an IPhone from the bedroom where the occupant of the apartment was sleeping. They discovered they were on video and they disconnected the camera. Taylor wanted to kill the occupant because he was seen on camera. Watson and Gordon convinced him to leave, and Taylor, Watson and Gordon then left together in the Sebring.

According to the cooperating individual, the group wanted more money so they drove to a west side subdivision. Larry Taylor tore the back patio screen to a home [redacted] Sunnyfield Court), reached inside, and unlocked the deadbolt. Taylor, Gordon and Watson entered the house, where they stole televisions and a laptop. They loaded the items in the Chrysler Sebring.

They decided they wanted more money. Larry Taylor walked to [redacted] Sunnyfield Court and opened the unlocked front door. Taylor and Watson entered the front door. Gordon waited

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Detective Thomas Lehn

at the Chrysler Sebring, which was parked in the driveway at [redacted] Sunnyfield Court. Watson later exited the house and came to the car. Watson said there was a woman inside and Taylor busted her in the mouth with his gun. They discussed leaving, but Taylor then walked to the car and threw a couple of cards in the car. Watson drove to an ATM on Michigan Road, with Gordon in the car as well. Taylor called Gordon's phone. Gordon handed the phone to Watson. Watson discussed numbers with Taylor and Watson attempted a transaction, but it did not work.

Watson drove to another ATM on 86th St. Watson walked to the ATM and withdrew money. Watson and Gordon were going to leave Taylor but he threatened to kill the woman if they left him. [redacted] called and said Taylor was family and they could not leave him. Watson drove back to the addition and Gordon exited the car at the addition entrance. Watson drove in the addition and picked up Taylor. Watson and Taylor picked Gordon back up and dropped off Taylor near 56th and Guion Rd. At this point, Taylor was in the front passenger seat which matched [redacted] home video on Sunmeadow. Taylor took the stolen property from the car, including a bag over his shoulder. Watson and Gordon drove to the Boulevard neighborhood and left the car.

The group eventually met back at [redacted] apartment in the Cottages. Larry Taylor told Watson, Gordon, [redacted] and possibly [redacted] he killed the woman. Taylor stated that she charged at him and he shot her somewhere in the upper body so he would not be scratched.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

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Taylor then told them that he leaned over her body and shot her in the back of the head. He leaned further, looked at her face, and watched her bleed.

All events occurred in Marion County, IN.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

AFFIANT

DATED: November 23, 2015

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE