

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS

Detective Stephen Smalley has knowledge that:

On May 30, 2020, at 11:43 p.m., Officers with IMPD were assisting a person in the 100 block of E. Vermont St. May 30 was the second night of protests and looting in the downtown area of Indianapolis. There was an increased police presence to handle the large crowds and high volume of emergency calls. While on scene, officers were informed there was a person down nearby. Sergeant Streeter was directed by the crowd to the 400 block of North Talbott Street where he located a subject, later identified as Christopher Beaty, suffering from multiple gunshot wounds. Officers reported the incident via police radio and requested additional officers and medics to the scene. Medics responded and declared Christopher Beaty deceased at 11:47 p.m. Homicide was requested and Detectives Stephen Smalley, David Miller, Christopher Winter, Lottie Patrick, and David Everman responded to the scene.

Crime Scene Specialist Kaylee Schellhaass responded to process and document the scene. Two 9mm shell casings, a cell phone belonging to Christopher Beaty, a phone charger, and two vape pens were recovered from 400 N. Talbott St. During a later search of the area, three additional 9mm shell casings were located. All five shell casings were submitted to the crime lab for further analysis.

On June 1, 2020, Detective Smalley attended the autopsy of Christopher Beaty at the Marion County Coroner's Office. The autopsy was conducted by Dr. Christopher Poulos. Beaty had four gunshot wounds: one to the left upper arm, one to the lower back, one to the upper left chest, and one to the neck. Christopher Beaty's cause of death was determined to be multiple gunshots, and the manner of death homicide. Two fired bullets were recovered from Christopher Beaty's body during the autopsy. The fired bullets were submitted to the crime lab for analysis.

As Detective Smalley continued to investigate the homicide of Christopher Beaty, he was notified by Detective Ted Brink of a robbery in the Newpoint parking garage across the street that occurred shortly before the homicide.

MAY 30, 2020 11:23 P.M. ROBBERY OF A.Z.

On May 30, 2020, Officer Eric Harris was near Vermont Street and Pennsylvania Avenue when he was flagged down by a female, later identified as A.Z, who reported a robbery that had just occurred. Due to the protests taking place in the area at that time, Officer Harris did not have time to get any information beyond A.Z.'s name and contact information. Officer Harris gave her a case number, IP200052458, and sent A.Z. on her way.

The following day, A.Z. logged onto the application "Find my iPhone." The phone had pinged at two locations. A.Z. thought this information would be beneficial, so she called to make a supplement to the case report. The reporting officer, James McGunegill, could not find the original case number, so he made a new report under case number IP200052655. Both of these cases were assigned to Detective Ted Brink on June 1, 2020.

Detective Brink interviewed the victim in the robbery, A.Z., and learned the following: A.Z. was sitting in her vehicle in the parking garage at 167 East Vermont Street shortly before 11:30 p.m. when she was approached by four black males, one of which knocked on her driver door window. She looked up and saw the male was pointing a handgun at her window. She opened her car door and the male at the window reached in the vehicle, pointed the gun at her face, and asked where her car keys were. The other suspects opened the rear car doors and took property from the vehicle. Another suspect opened the front passenger door, pulled her across the center console by her collar, and asked where her car keys were. The other suspects rummaged through her vehicle before walking away. When the suspects walked away, she got out of her vehicle, picked up some of her property from the ground, returned to her vehicle, and drove away.

Video Forensics Detective Jason Leitze assisted in recovering surveillance video from the Newpoint parking garage as well as from Mass Ave. Family Dentistry located at 310 N. Delaware. A review of this surveillance video and witness statements identified five suspects as being involved.

#1, A black male, late teens early 20's, 5'7", 160 pounds, wearing a red baseball cap, a surgical mask, a large diamond earring in his left ear, a blue Tommy Hilfiger sweatshirt with a

red t-shirt under it, light blue jeans with a black belt, light green underwear, blue surgical gloves, and Jordan 4 tennis shoes.

#2, A black male, late teens early 20's, 5'11, 160 pounds wearing a black ski mask, a black Nike hooded sweat shirt with white stripes and Nike logos down the sleeves, blue surgical gloves, black Adidas athletic pants with three white stripes down each pant leg, and black tennis shoes with white soles.

#3, A black male, early to mid-20's, 5'6", 175 pounds, chin length dreadlocks with a receding hair line, wearing a dark blue and white surgical mask, a white t-shirt with a logo on the front, a dark jacket tied around his waist, blue surgical gloves, black jeans, and black tennis shoes.



SUSPECT #1



SUSPECT #2

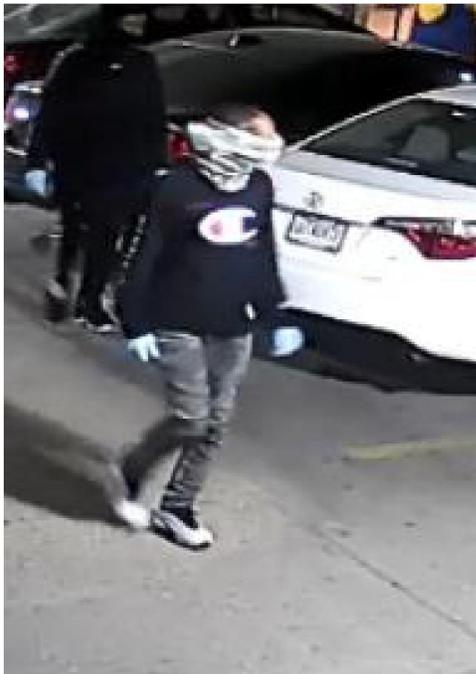


SUSPECT #3

#4, A black male, late teens to early 20's, 5'11, 150 pounds, long hair in a bun under a mask covering the bottom part of his face, wearing a black Champion sweatshirt with a large

Champion logo on the front, blue surgical gloves, light grey jeans, and white and black tennis shoes.

#5, A black female, 20's, wearing an oversized multicolored jacket with blue on the front, red on the back, yellow sleeves, and a green hood, blue surgical gloves, black leggings, and white tennis shoes with red accents on the sides and soles.



SUSPECT #4



SUSPECT #5

The suspects are first seen on surveillance footage at approximately 11:20 p.m. on May 30, 2020. The suspects are on foot in the 300 block of N. Delaware Street, less than one block from the robbery of A.Z.

Video shows the suspects then enter the Newpoint parking garage at 167 East Vermont Street through an entrance off Tippecanoe Street at approximately 11:30 p.m. Suspect #5 entered the garage behind the other suspects. As she entered the garage, she pulled the hood of her jacket up and cinched the hood around her face. Suspect #5 looked over her right shoulder twice as the other suspects approached A.Z.. Suspect #5 approached the victim within six feet of the driver side of the vehicle, looked at the driver side window where A.Z. was seated, and as she passed,

held the hood of her jacket around her face. When Suspect #5 passed A.Z.'s vehicle, she dropped her hands from the hood of the jacket and smiled.

Suspects #1, 2, 3, and 4 approached A.Z., who was seated in her vehicle. Suspect #1 handed Suspect #2 a silver and black semi-automatic handgun. Suspect #2 approached the driver side door of the vehicle and held the gun up to the glass. Suspect #5 walked in front of Suspect #2 while he was holding the gun. A.Z. opened the car door and Suspect #1 reached into the driver compartment and grabbed a bag belonging to A.Z.. At the same time Suspect #3 opened the front passenger side door and held A.Z. down while Suspect #2 opened the driver side rear door and removed items from the back seat. Suspect #1 walked behind the vehicle and emptied the contents of A.Z.'s bag on the ground. Suspect #2 dropped some of the property located in the back seat onto the ground. Suspect #4 picked up a small bag that was dropped onto the ground. Suspect #1 picked up a wallet. All of the suspects then fled North through the parking garage and out of frame. A.Z. got out of her vehicle, picked up some of her property, and keys then drove out of the garage. Approximately one minute later, the suspects are seen fleeing the garage on foot.

MAY 30, 2020 SHOTS FIRED NEWPOINT PARKING GARAGE

On May 31, 2020, D.M. determined that sometime after noon on May 30, 2020, his 2017 grey Mustang had his driver's side window broken while the car was parked on the east side of the Newpoint Parking Garage. This is the same parking garage where the robbery of A.Z. occurred. D.M. located a shell casing by his driver's side door and a bullet in his driver's seat. D.M. moved the vehicle to the west side of the parking garage. Evidence Technician Maurice Norris, recovered the shell casing by the initial parking spot as well as the bullet from D.M.. The shell casing and bullet were transported to the IMPD property room and submitted to the crime lab for further analysis.

MAY 30, 2020 11:33 P.M. ROBBERY OF UNKNOWN PERSON

A review of surveillance video in the area shows that at approximately 11:33 p.m., the five suspects are seen west in the 100 block of E. Michigan St. from the 400 block of N. Delaware St. Suspect #3, the b/m with chin-length dreadlocks, was walking in front of the group

and Suspect #5, the female in the multi-colored jacket, is walking at the rear of the group. An unknown subject can be seen approaching the suspects from the west on foot. Suspect #3 is seen extending an arm at the unknown subject, who stops walking and stands still. Suspect #3 can be seen knocking the person to the ground. A brief struggle ensues, the suspects continue west, and the unknown person gets up and runs east from the suspects.

MAY 30, 2020 11: 36 P.M. ROBBERY OF A.B., B.M., AND A.T. & MAY 30, 2020 11: 36 P.M. ROBBERY OF S.M. AND S.F.

While on scene investigating the homicide of Christopher Beaty, Detective Smalley was advised that five people reported being the victims of an armed robbery with shots fired in the 400 block of N. Talbott St. shortly before Beaty was found. Detective Smalley took recorded statements from the victims and learned the following:

A.T. stated he was in a vehicle with J.S., A.B., and B.M. on their way to 402 North Delaware Street. They parked in the lot north of the location, which adjoins 400 North Talbott Street to the east. They parked the car and were walking toward 400 North Talbott Street when J.S. said "Run!" and ran away from the group. A.T., A.B., and B.M. were forced to the ground by four or five black males. A shot was fired during the robbery and his phone, phone charger, and wallet were taken by one of the suspects. When the robbery was complete, A.T. fled south and then heard shots fired in the area of 400 North Talbott Street.

A.B. stated she was in a vehicle with B.M., A.T., and J.S. at 402 North Delaware Street. They parked the vehicle and were approaching the building when J.S. said "Run!" and then fled from the group. A.B. was grabbed by her shirt and forced to the ground by a group of four black males. Two of the suspects were armed with handguns, one of which was silver and black. One of the suspects took her phone during the robbery, but left it at the scene when they fled. A shot was fired during the robbery. When the robbery was complete, A.B. heard more shots fired in the 400 block of N Talbott Street. A.B. did not see Christopher Beaty at any time during the robbery.

B.M. stated he was with A.B., J.S., and A.T. at 402 North Delaware Street when they were approached by a group of four or five black males, B.M. and his friends were forced to the

ground and one of the suspects took his cell phone, wallet, and vape pen. While B.M. and his friends were being robbed, a female wearing a backpack approached on foot and was also robbed by the same suspects. B.M. saw one of the suspects press a gun to A.T.'s head during the robbery.

J.S. stated he was with A.B., B.M., and A.T. at 402 North Delaware Street when he saw a group of four or five black males running towards him. He yelled for his friends to run and ran south on North Talbott Street. J.S. could hear yelling and screaming from where his friends were as he entered the apartment building at 402 North Delaware Street. Once his friends came running, J.S. heard another gunshot so they sprinted inside the building. J.S. did not witness the robbery.

S.M. said she was at the riot downtown with her friend, S.F.. They were walking north in the 400 block of North Talbott Street when they happened into an armed robbery in progress. Two white males and a white female were on the ground, and a black male waving a silver and black semiautomatic handgun ordered S.M. and S.F. to the ground. The male with the gun was with three or four other people, one of which was a black male that was crouched over one of the victims on the ground. At least one of the suspects was yelling "Pockets!" at them. S.M. and S.F. got on the ground and were patted down by one of the suspects. One of the suspects kicked one of the male victims in the head. A shot was fired near S.M.'s head and one of the suspects said "We gotta go." The suspects then ran northeast from the 400 block of North Talbott Street, and S.M. and S.F. fled southwest to the intersection of North Pennsylvania Street and East Vermont Street. S.M. and S.F. were right around the corner and S.F. called 911 to report the robbery when they heard more gunshots nearby. While waiting for police to arrive, S.M. thought she saw the suspects that had robbed them walking on Pennsylvania Street, so they moved to another location until officers arrived. Nothing was taken from S.M. in the robbery. S.M. did not see Christopher Beaty at any time during the robbery. Detective Smalley researched the computer aided dispatch history reference the robbery and determined that S.F. had called 911 at 11:39 p.m.

S.F. told Detective Smalley she was walking north in the 400 block of North Talbott Street with S.M.. S.F. saw a black male that ordered her to the ground while motioning with a

handgun. S.F. realized there was a robbery in progress involving multiple suspects standing over multiple victims on the ground. She was tripped to the ground, patted down, and one of the suspects took a backpack from her containing her keys, debit card, and identification. During the robbery, the subject with the gun fired a shot near S.M.'s head. When the robbery was complete, the suspects ran northeast and S.F. and S.M. ran southwest before calling 911. S.F. was livestreaming from a mobile device up until the moment she encountered the robbery suspects, but did not capture any of the suspects on the video. Moments before the video ends, a male voice can be heard saying "C'mon! you already over here, c'mon!"

The phone charger collected by CSS Kaylee Schellhaass at the scene of the homicide of Christopher Beaty was determined to belong to A.T. and the two vape pens collected were determined to belong to B.M.

MAY 30, 2020 11:39 P.M. MURDER OF CHRISTOPHER BEATY

Christopher Beaty's body was in the 400 block of N. Talbott St. just south of the location of the above robberies. His cell phone was located just north of his body in the road. Detective Smalley submitted the phone belonging to Christopher Beaty to IMPD's Digital Forensics Unit for additional examination.

A review of the contents of Christopher Beaty's phone shows Beaty sent a text message at 11:34:19 p.m. that reads:

"I'm right downtown by the Eagle. The protest was at the war memorial, which a block from where I live."

At 11:35:16 Beaty sent a message reading:

"I'm bout to walk around the block now to make sure my building is good."

Surveillance video shows Beaty exiting the front door of his building at 402 N. Delaware St. and walking towards N. Talbott St. at 11:36 p.m.

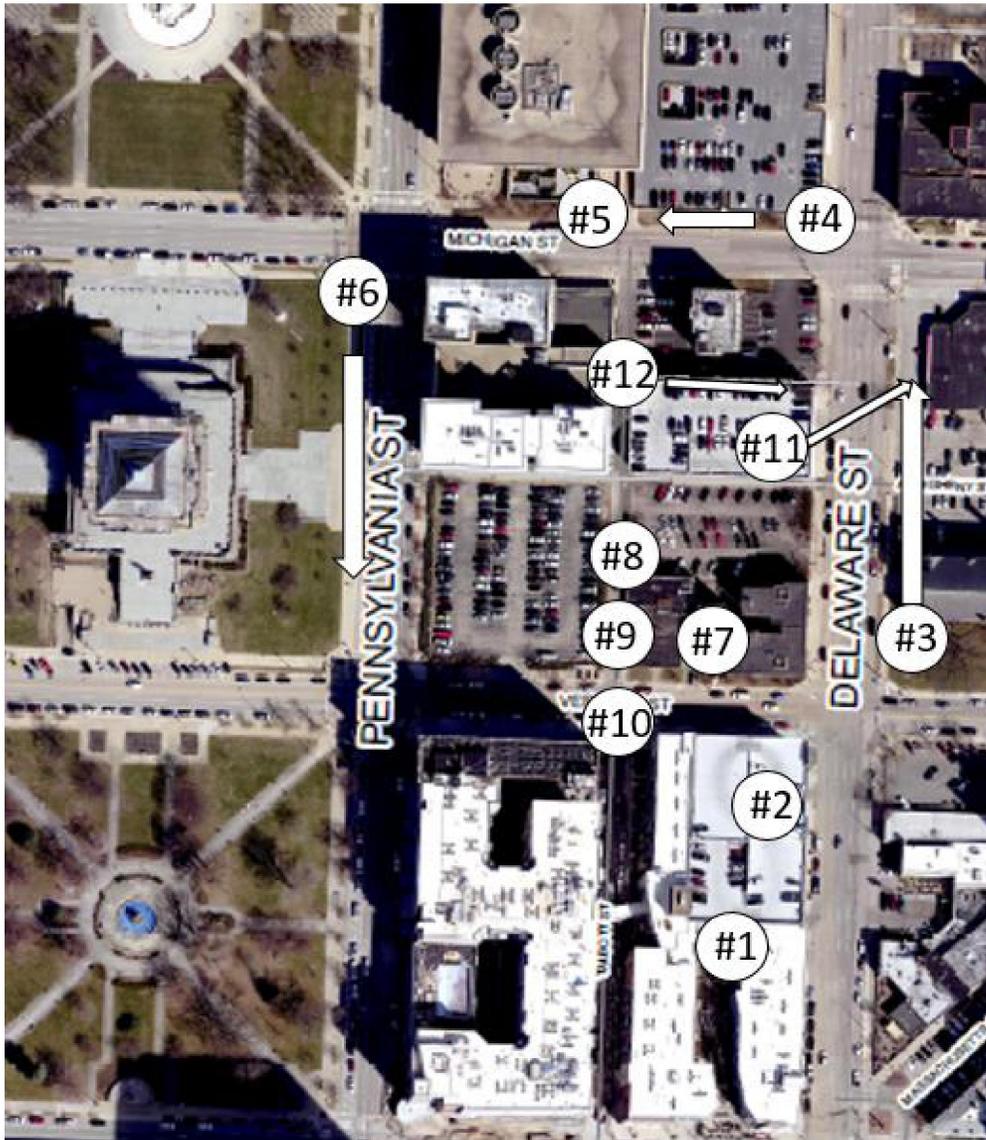
May 30, 2020 ATTEMPTED ROBBERY OF K.S.

On June 1, 2020, K.S. reported that on the evening of May 30, 2020 at approximately 11:40 p.m., he was at the intersection of N. Vermont St. and E. Talbott St. K.S. stated that two black males, one around 19 years old and the other around 21 years old approached his vehicle and pointed handguns at his vehicle. They told K.S. to “get out of the car.” K.S., afraid for his life, put his vehicle in reverse and fled the area. K.S. believed that they tried to shoot at the driver’s side front tire as he was leaving the intersection, but he was unsure.

CSS Specialist recovered a fired bullet from under the hood of K.S.’s 2005 gold Toyota Prius. The fired bullet was submitted to the crime lab for further analysis.

TIMELINE

Detective Jason Leitze was able to obtain additional surveillance footage from 400 N. Delaware St., 429 N. Pennsylvania Ave., 310 N. Delaware St., 127 E. Michigan St., and 167 E. Vermont St. as well as footage from the Indiana War Memorial at 400 N. Pennsylvania St. that was recorded on May 30, 2020. Using surveillance footage and witness statements, Detective Smalley was able to create the following timeline of the suspects’ movements throughout the immediate vicinity of the above-mentioned robberies and murder of Christopher Beaty:



- 11:20 p.m. The five suspects that committed the robbery at 167 E. Vermont St. are seen on foot in the 300 block of N. Delaware St. (#1 on Map)
- 11:23 p.m. The five suspects are seen committing the robbery at 167 E. Vermont St. Suspect #1 is seen passing a black and silver semiautomatic handgun to Suspect #2. (#2 on Map)
- 11:32 p.m. The five suspects are seen walking north in the 400 block of N. Delaware St. (#3 on Map)

- 11:33 p.m. The five suspects are seen west in the 100 block of E. Michigan St. from 400 N. Delaware St. Suspect #3 is seen extending an arm at the unknown subject and then knocking the person to the ground. (#4 and #5 on Map)
- 11:34 p.m. The five suspects walk south on 400 N. Pennsylvania St. from E. Michigan St. (#6 on Map)
- 11:36 p.m. Christopher Beaty is seen leaving his apartment building and walking towards 400 N. Talbott St. (#7 on Map)
- 11:36 p.m. A.B., B.M., and A.T. are robbed in the 400 block of N. Talbott St and a shot is fired. (#8 on Map)
- 11:36 p.m. S.F. and S.M. are robbed in the 400 block of N. Talbott St. (Same location, #8 on Map)
- 11:39 p.m. Christopher Beaty is murdered in the 400 block of N. Talbott St. (#9 on Map)
- 11:40 p.m. An attempt at a robbery on K.S. is made and a shot is fired. (#10 on Map)
- 11:41 p.m. Suspect #3 is seen walking northeast in the 400 block of N. Talbott St. Suspect #3 now has the dark jacket on over his light-colored shirt. Suspect #3 then runs northeast across Delaware St. and waits at the intersection of N. Delaware St. and E. Michigan St. (#11 on Map)
- 11:42 p.m. Suspect #1, Suspect #4 and Suspect #5 are seen walking from the 400 block of N. Talbott St. They cross Delaware St. and meet with Suspect #3. (Same location. #11 on Map)
- 11:42 p.m. Suspect #2 is seen walking north in the 400 block of N. Talbott St. He then crosses to N. Delaware St. and joins the other four suspects. (#12 on Map)
- 11:44 p.m. The five suspects walk west on E. Michigan St. and continue south in the 400 block of N. Pennsylvania St. toward Vermont St., the location where S.F. reported seeing the suspects that robber her shortly after the robbery. (Same location as #4 and #5 on Map)

An earlier incident was later determined to be connected to the events of May 30, 2020. On May 29, 2020, the Twin Jeweler's store in the Circle Center Mall was burglarized. Video surveillance shows multiple people in the store and shots being fired. Three 9mm shell casings and parts of spent rounds were recovered from the store. The casings and bullets were submitted to the crime lab for further analysis.

IDENTIFICATION OF SUSPECTS

Detective Jason Leitze submitted video stills and video surveillance from footage recovered from the Newpoint parking garage to be posted online for the public to view to assist in identifying the suspects. Detective Brink received anonymous tips that Suspect #1 was Dorian Murrell and that he was shot downtown later that night. Detective Brink also received anonymous tips that Suspect #2 was Alijah Jones, who is Dorian Murrell's brother.

Detective Brink researched the names Dorian Murrell and Alijah Jones and learned that Dorian Murrell was the victim of a homicide that occurred at approximately 2:00 a.m. on May 31st, 2020, IMPD case number IP200052501. This homicide occurred at 10 East Market Street, less than half a mile from the homicide of Christopher Beaty. Alijah Jones was reported to be a witness to the homicide of Dorian Murrell. Detective Brink looked at photos taken of Murrell at the Morgue during his autopsy. Every item of clothing worn by Suspect #1 in the robbery at 167 East Vermont Street, with an exception of the Tommy Hilfiger sweatshirt, was worn by Murrell at the time of his death.

Detective Stephen Smalley reviewed incident reports and statements taken by Detective Patrick reference the homicide of Dorian Murrell, case number IP200052501, and learned the following: On May 31, 2020, at 2:05 a.m., IMPD Officers responded to 10 East Market Street reference a person shot. Responding Officers found Dorian Murrell with a single gunshot wound to his torso. Murrell was transported to Eskenazi Hospital by Medics and later declared deceased.

Detective Lottie Patrick and Detective David Miller responded to Eskenazi Hospital to speak to the family of Dorian Murrell. At approximately 3:45 a.m. Alijah Jones was interviewed by Detective Patrick and Detective Miller at Eskenazi Hospital. He said he was with his brother, Dorian Murrell, near Monument Circle when Murrell was shot.

While speaking to Alijah Jones, Detective Miller observed Jones wearing black Adidas athletic pants with three white stripes similar to what Suspect #2 was wearing during the robbery at 167 East Vermont Street. Alijah Jones told Detective Patrick that he didn't know the names of the people he was with at the time of the shooting, but one of them was "Marcus."

While at Eskenazi hospital, Detective Miller observed a black male wearing a distinct multi-colored jacket that was pacing near the Emergency Room entrance. Detective Miller asked a family member who the male was, as the male appeared distressed. The family member told Detective Miller that the male in the jacket was “Marcus” and that he had witnessed the shooting of Dorian Murrell. Detective Miller attempted to speak with Marcus, but could not get a response. Detective Miller later reviewed the surveillance footage of the robbery of A.Z. at 167 E Vermont Street and recognized the jacket worn by Suspect #5 as the same jacket worn by “Marcus” at Eskenazi Hospital. Detective Miller also observed that “Marcus” had dreadlocks similar in style and length, and a distinct receding hairline similar to Suspect #3.

On June 5, 2020, Detective Smalley received a call and text message from S.F.. She saw the news story about the robbery at 167 East Vermont Street and advised that the suspects in the surveillance video are the same suspects that robbed her in the 400 block of North Talbott Street. She said the suspect in the white t-shirt with dreadlocks (Suspect #3) had a gun when she was robbed.

On June 6, 2020, Detective Smalley received a call and text message from B.M. saw the surveillance footage of the robbery at the parking garage at 167 E Vermont Street on the news and recognized those suspects as the same people who robbed him in the 400 block of North Talbott Street.

On June 7, 2020, Detective Brink received an anonymous tip that the suspect in the robbery at 167 East Vermont Street in the white shirt and dark pants was Marcus Anderson. Detective Brink followed up on the tip and identified a Marcus Anderson, 06/20/1997. Detective Brink found a BMV photo of Anderson and observed that he resembled Suspect #3. On May 31st, 2020, the day of Murrell’s death, Marcus Anderson posted a message on his Facebook page regarding the death of Murrell:

“Man RIP Dee Chrishawn My mf brother from another!! Bitxh we done did waaay to much for you to be leaving us this early. Jesus got you now brother. Watxh over your people and keep em safe man they need closure.”

Detective Smalley found that Dorian Murrell's Facebook name was Dee Crishawn, and that he and Marcus Anderson are "friends" on Facebook.

Detective David Miller viewed a BMV photo of Marcus Anderson and recognized him as the male wearing the multi-colored jacket at Eskenazi Hospital on May 31, 2020, that was identified by a family member of Dorian Murrell as "Marcus."

On June 22, 2020, Probation Director Megan Durbin received an anonymous tip from a female that identified herself as an ex-girlfriend of Marcus Anderson 06/20/1997. The female said that Anderson may have been involved in the homicide of Christopher Beaty. Director Durbin advised Detective Smalley that Anderson was on probation for robbery.

On July 7, 2020, Detective Smalley received a call from L.L. L.L. saw the surveillance video of the robbery at 167 East Vermont Street on the news and recognized Suspect #2 as Alijah Jones. She advised that her son has been friends with Jones for years, she has known Jones since he was young, and immediately recognized him in the video.

On July 22, 2020, Detective Smalley received information that the female suspect, Suspect #5, was Dorian Murrell's girlfriend, Nakeyah Shields. Detective Smalley researched the name Nakeyah Shields and found a Nakeyah Shields, 12/06/2000. Detective Smalley viewed a BMV photo of Shields and observed she bore a strong resemblance to Suspect #5 in the surveillance video of the robbery at 167 East Vermont Street. Detective Smalley reviewed the Facebook page belonging to Nakeyah Shields and found a post made on May 31, 2020 with pictures of Dorian Murrell and Nakeyah Shields together. The text accompanying the post read in part:

"I was there with you 🤔 I held you, I tried everything to save you."

On July 29, 2020, Detective Smalley received a tip that included a Facebook Live video that was recorded immediately after the shooting of Dorian Murrell on May 31, 2020. The video showed a female lying on the ground that appeared to be crying. The female was wearing shoes and pants identical to Suspect #5 in the surveillance footage as well as a Tommy Hilfiger jacket similar to the one worn by Suspect #1 from 402 North Delaware Street, 429 North Pennsylvania Avenue, 310 North Delaware Street, 127 East Michigan Street, and 167 East Vermont Street.

Dorian Murrell was shown lying on the ground and unresponsive. A subject was seen crouched over Murrell and could be heard saying "That's my brother." The subject's demeanor and body language indicated that he was referring to Murrell, leading Detective Smalley to believe that the subject crouched over Murrell was Alijah Jones. The subject believed to be Jones was wearing a sweatshirt, ski mask, pants, and shoes identical to those of Suspect #2 in the surveillance footage from 402 North Delaware Street, 429 North Pennsylvania Avenue, 310 North Delaware Street, 127 East Michigan Street, and 167 East Vermont Street.

The subject believed to be Alijah Jones could be seen talking to and shoving a male subject in a multicolored jacket identical to the jacket worn by Suspect #5 in surveillance footage from 402 North Delaware Street, 429 North Pennsylvania Avenue, 310 North Delaware Street, 127 East Michigan Street, 167 East Vermont Street, and the jacket worn by the subject at Eskenazi Hospital identified by Detective David Miller as Marcus Anderson. The subject was wearing pants and shoes identical to those worn by Suspect #3 in the surveillance footage from 402 North Delaware Street, 429 North Pennsylvania Avenue, 310 North Delaware Street, 127 East Michigan Street, and 167 East Vermont Street. This led Detective Smalley to believe that the Jacket worn by Suspect #5 in the surveillance footage from 402 North Delaware Street, 429 North Pennsylvania Avenue, 310 North Delaware Street, 127 East Michigan Street, and 167 East Vermont Street, was worn by Marcus Anderson at the time Murrell was shot.

Detective Smalley reviewed surveillance footage recovered from the Hilton Garden Inn at 10 East Market Street that captured the moments after the shooting of Dorian Murrell. 10 East Market Street is less than a block from where Murrell was shot. At approximately 2:05 a.m., several people could be seen running from the area where Murrell was shot. A male with a receding hairline and wearing a multicolored jacket could be seen running from the area. The jacket was identical to the jacket worn by Marcus Anderson at Eskenazi Hospital.

FACEBOOK RECORDS

On July 24, 2020, Detective Marc Klonne of the IMPD Violent Crimes Unit applied for and was granted a search warrant for the Facebook account belonging to Marcus Anderson. On

August 6, 2020, Detective Klonne received the responsive records and provided them to Detective Smalley.

Detective Smalley found messages sent by Marcus Anderson to multiple Facebook users that included a video of an unseen subject displaying Tommy Hilfiger and Polo brand clothing. The clothing was new and had security devices and sales tags still intact. One of the messages was sent to an account identified at D.S.E.. Detective Smalley found the following exchange between Anderson and Saunders on May 30, 2020:

Marcus Anderson: *Clothes. Hoodies jeans and shirts. Polo and Tommy Hilfiger*

S.E.: *Ok*

S.E.: *Lol u was down there*

Marcus Anderson: *Fucked em up*

Marcus Anderson: *Bro nem was down there*

Detective Smalley found the following exchange between Marcus Anderson and the Facebook user N.H.:

Marcus Anderson: *Clothes. Hoodies jeans and shirts. Polo and Tommy Hilfiger*

N.H.: *Is that your stuff*

Marcus Anderson: *Me n nigga*

N.H.: *Where the hell u get it*

Marcus Anderson: *Mall*

Detective Smalley located Facebook messages exchanged between Marcus Anderson and Alijah Jones on June 2, 2020:

Marcus Anderson: *Whats up bro, you straight? Is it coo if i stay there and work at the*

job when it start back up? I dont got nobody else out here to help me get back and forth

Marcus Anderson: *Ill help out on the food cuz i get stamps. Or the bills either one*

Alijah Jones: *That ain't no good idea you need to be hiding out and shit from the other night and my brother looking for another job so you still wouldn't have a way out there*

Marcus Anderson: *Damn. Okay imma hit you back when i can come and grab them Clothes*

Alijah Jones: *Aye you need to lay low get out of town or something I just seen the report from that dude*

Alijah Jones: *Ima send it to you but you gotta delete our whole message thread and all that shit*

Marcus Anderson: *What dude*

Alijah Jones: *Nigga from the alley*

Alijah Jones followed this message by sending a picture of a Facebook post describing the murder of Christopher Beaty and describing two possible suspects. After sending the picture, Alijah Jones sent a Message to Marcus Anderson saying:

"Delete this shit."

Records also showed that Alijah Jones removed Marcus Anderson as a Facebook friend on June 2, 2020.

On June 10, 2020 Marcus Anderson sent a Facebook message to a user identified as Z.S., stating:

"I need to move down there. Tbh I'm in a lil trouble up here and I def need to get tf lost."

Detective Smalley researched the account belonging to Z.S. and found the owner of the account listed her home state as Texas.

Detective Smalley located messages between Facebook user G.C. on June 19, 2020:

G.C.: *lol hair ahh mane*

Marcus Anderson: 🤔🤔🤔

Marcus Anderson: *Had to cut it bro*

At the time of his arrest on August 13, 2020, Marcus Anderson had short hair and no longer had the chin-length dreads as seen in the surveillance video or his BMV identification photo.

On August 10, 2020, Detective Marc Klonne of the IMPD Violent Crimes Unit applied for and was granted a search warrant for the Facebook account belonging to Nakeyah Shields. On August 27, 2020, Detective Klonne received the responsive records and provided them to Detective Smalley. Detective Smalley reviewed the records and found messages exchanged between Nakeyah Shields and Marcus Anderson on June 4, 2020:

Marcus Anderson: *Aye somebody wanna buy that gun. Ask bro do he want to sell it*

Nakeyah Shields: *Don't talk like that on my phone*

Nakeyah Shields: *I don't know what you talking about*

Marcus Anderson: *My bad u right*

MARCUS ANDERSON STATEMENT

On August 11, 2020, an arrest warrant was issued for Marcus Anderson for Armed Robbery and Criminal Confinement, reference the robbery of A.Z. at 167 East Vermont Street, cause number 49G02-2008-F3-025061.

On August 13, 2020, Detectives Stephen Smalley and David Miller took a recorded statement from Marcus Anderson at the Marion County Jail, where Anderson was being held for a violation of probation reference a robbery conviction in 2018. Detective Smalley advised Anderson of his Miranda Rights. Anderson signed a waiver of rights form and gave a statement to Detectives Miller and Smalley. Anderson said that he remembered talking to Detective Miller at the hospital the night Murrell was shot and that he was “right there” when it happened. Anderson said that he rode downtown with Dorian and his brother in Dorian’s car. When asked if Anderson was in a parking garage he said that it “was possible.” Anderson was evasive when asked who he was with downtown. He said when they decided to leave, they couldn’t get to their car because a murder had happened and their car was parked inside crime scene tape. Anderson said he didn’t know where they were downtown, that they were walking with no destination, and that nothing happened that night.

A video from the evening of May 30, 2020 was recovered from a civilian in the area of 400 N. Talbott St. A white Nissan Murano similar to the one registered to Alijah Jones can be seen parked in the immediate area of E. Vermont St. and N. Talbott at the time Christopher Beaty’s body is discovered.

NAKEYAH SHIELDS STATEMENT

On August 14, 2020, Detective Smalley met with Nakeyah Shields at 50 N. Alabama St. for a recorded statement. Detective Smalley advised Shields of her Miranda Rights. She signed a waiver of rights form and gave a statement to Detective Smalley. Shields began her statement by saying that she didn’t know who killed Christopher Beaty because she “wasn’t paying attention.”

Shields said the night Beaty was murdered, she was downtown with Alijah Jones, Dorian Murrell, Marcus, whose last name she didn’t know, and an unknown male. Detective Smalley showed Shields a photo array contained Marcus Anderson. She identified the known photograph

of Marcus Anderson as the Marcus that was with her downtown. Shields said she rode downtown with Dorian in his vehicle and parked at a location that was a two or three- minute walk from 167 E. Vermont St. They went inside a parking garage and a robbery was committed. Shields said she walked past because she “didn’t want to see it.” Shields said that immediately after the robbery, Jones said that he “had to shit” so he went to some bushes and asked Murrell and Shields to “watch out for him.” Shields said she was standing near a car with Murrell and saw Christopher Beaty walk by while smoking a blunt. Shields said to Murrell that Beaty was smoking a blunt and “It must be nice.” Beaty told Shields to be safe and he continued straight in the alley. Shields said Beaty walked past Alijah in the bushes.

Shields heard a gunshot, and ran out of the alley with Murrell. Shields said that Anderson and the unknown male were not with her and Murrell when they ran from the alley. She did not see Beaty get shot because she was “focused on the opposite direction”. After she ran from the alley, the group found Jones and tried to return to their vehicle to leave but found the vehicle was inside the crime scene and could not be accessed.

On August 12, 2020 Nakeyah Shields provided an additional statement to Detective Smalley. Detective Smalley advised Shields of her Miranda Rights, Shields signed a waiver of rights form and gave a follow-up statement to Detectives Smalley, Miller, and Special Agent Langerman.

Shields stated that after the parking garage robbery, they continued walking and another robbery was committed by the group before the shooting of Christopher Beaty. Shields said that when the second robbery occurred, the group was walking in front of her and she saw Jones and Anderson “scuffling” with the unknown victim. Shields said she kept on walking when the robbery happened and was minding her own business. After the second robbery, they walked to an alley and Jones asked Murrell to “cover him” while he defecated in the bushes. Shields was standing near the alley and an intersecting street, was talking to Murrell, and on the phone with her cousin. Anderson and Suspect #4 continued walking in the alley. Shields did not see anyone else in or near the alley. Christopher Beaty walked by, told her to be safe, and continued walking. She heard shots and ran out of the alley with Murrell, leaving Jones in the bushes. She

stated no one discussed the shots fired the alley. When asked if there were any other robberies than the two she described, Shields responded, “not that I remember.”

CONTINUED INVESTIGATION

On August 13, 2020, Detective Stephen Smalley and Sergeant Christopher Lawrence responded to Tippecanoe County Jail where Alijah Jones was being held for Possession of Marijuana and Operating a Vehicle While Intoxicated. Alijah Jones was transported to Marion County Jail.

On August 14, 2020, Detective Ted Brink conducted a photo array with A.Z.. He presented photo array 155372 to A.Z.. A known photograph of Marcus Anderson was placed in position #6. A.Z. indicated she was fairly certain person #6 was the person who held her down in the vehicle. When asked for a percentage of certainty, A.Z. indicated she was 80% sure because the other photographs looked similar to the person she selected.

Detective Smalley researched calls made by Alijah Jones from Marion County Jail after his arrest on August 13, 2020. Detective Smalley located a call made by Jones on August 14, 2020 at 5:22 p.m. to an unknown female. Jones and the female discussed Jones’ arrest and that a second person, Marcus, was arrested reference the same investigation. Jones said that Marcus was a friend of his brother and that Marcus must have “Said something.” On August 14, 2020, at 7:34 p.m., Jones made a call to an unknown female and discussed his arrest and the arrest of Marcus Anderson. Referring to Marcus, Jones said there was there was someone with them “that night” and that “This dude is trying to put some shit on me.” On August 16, 2020, at 3:08 p.m., Jones made a call to a person known to law enforcement. While talking about Anderson’s arrest, Jones said he thought Anderson “Told and tried to tie me in with his shit.”

CELL TOWER LOCATION DATA

On August 4, 2020, Detective Marc Klonne applied for, and was granted a search warrant for phone records belonging to Marcus Anderson. On September 5, 2020, Detective Smalley received and reviewed the responsive records. The records show that Marcus Anderson’s phone was in the area of 400 N Talbott Street around the time that Christopher Beaty was killed.

On August 20, 2020, Detective Smalley applied for, and was granted a search warrant for phone records belonging to Nakeyah Shields. On September 23, 2020, Detective Smalley received and reviewed the responsive records. The records show that Nakeyah Shields' phone was in the area of 400 N Talbott Street around the time that Christopher Beaty was killed.

GOOGLE RECORDS

On August 22, 2020, Detective Smalley reviewed the Facebook records belonging to Marcus Anderson and identified a Google Gmail address associated with the account, marcusa315@gmail.com. Detective Smalley applied for, and was granted, a search warrant for the records associated with the Gmail address. On September 25, 2020, Detective Smalley received and reviewed the responsive records. Detective Smalley found a video that was saved to Anderson's account on May 30, 2020, that showed him wearing a shirt identical to the shirt worn during the robbery at 167 East Vermont Street.



FIREARMS EVIDENCE

Tim Spears, a forensic scientist with the Marion County Forensics Services Agency (crime lab), examined the following collected evidence:

- Spent 9mm Shell Casing from the area of D.M.'s Mustang (167 E. Vermont St.)
- Fired Bullet Jacket from driver's seat of D.M.'s Mustang (167 E. Vermont St.)

- Five Spent 9mm Shell Casings from scene of Robberies and Christopher Beaty Homicide (400 N. Talbott St.)
- Two fired bullets recovered from Christopher Beaty at autopsy
- Fired Bullet from Attempted Robbery of K.S.
- Three Spent 9mm Shell Casings from Burglary of Twin Jewelers (Circle Center Mall)
- Three Fired Bullet Fragments from Burglary of Twin Jewelers (Circle Center Mall)

Spears examined and compared each spent shell casing and determined they were all fired from the same firearm.

Spears examined and compared each fired bullet and determined they were all 9mm/ 38 caliber class bullets and were fired from the same firearm.

All events occurred in Indianapolis, Marion County, IN.

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

DATED: December 3, 2020

/s/ Stephen Smalley
AFFIANT