

**STATE OF INDIANA  
MARION COUNTY, ss:**

**IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION**

**Cause No: 49D27**

**STATE OF INDIANA** )  
 )  
**vs.** )  
 )

**INFORMATION**

**COUNT I**

**MURDER**

**I.C. 35-42-1-1(2)**

**A FELONY**

**COUNT II**

**ROBBERY RESULTING IN SERIOUS  
BODILY INJURY**

**I.C. 35-42-5-1(a)(1)**

**A LEVEL 2 FELONY**

**CHAD MARTIN W/Male  
DOB 1/9/1991**

On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on his/her oath (or having affirmed), says that in Marion County, Indiana

**COUNT I**

On or about April 29, 2024, CHAD MARTIN, did kill another human being, to wit: Shane Coffman; while committing robbery, which is to knowingly take property from another person or the presence of another person by using force;

**COUNT II**

On or about April 29, 2024, CHAD MARTIN did knowingly take a motor vehicle from Shane Coffman or the presence of Shane Coffman, by using force by physically preventing Shane Coffman from regaining control of his motor vehicle or by ramming Shane Coffman into a bollard; said act resulting in serious bodily injury, to wit: a torn liver or broken neck or broken pelvis or broken hip;

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

May 2, 2024

Date

**RYAN MEARS**

Marion County Prosecutor

19th Judicial Circuit

/s/ Matthew Bavender

Matthew Bavender, #25478-48

Deputy Prosecuting Attorney

**State's Witnesses:**

ADAM BANDY  
GIANA BENDER  
JOHN BURRELLO  
MICHAEL CONDON  
MICHAEL DUKE  
DEREK EISMAN  
ROBERT FEKKES  
JONATHAN FRANTSI  
BRET HASSE  
ANTHONY JOHNSON  
DUSTIN KEEDY  
SAMUEL KREIGH  
ANGELICA LEON  
MATTHEW MELKEY  
BRIAN WILLS  
John Cavanaugh M.D.  
KC  
GP

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Anthony D. Johnson swears (affirms) that:

On April 29, 2024, at approximately 2:29pm, officers with the Indianapolis Metropolitan Police Department were dispatched to the Arco gas station located at 2701 English Avenue reference a person down. Officer Bret Hasse was in the area and heard someone calling for help from the Arco lot and responded. He learned the person down was a victim of a carjacking with injury. Ofc. Kreigh arrived shortly after and spoke with the victim identified as Shane Coffman by ID he had with him. Ofc. Kreigh reports Mr. Coffman was struggling to breath and Mr. Coffman stated that while he was inside the Arco gas station someone stole his car. Mr. Coffman stated he left the car running with the keys in it and went inside. Mr. Coffman then came back outside to the suspect he described as a white male, blue eyes, curly hair in the driver seat of his blue Toyota Camry. Mr. Coffman stated he tried to pull the suspect out of the vehicle while it was still stationary. The suspect then drove off dragging him approximately 30 yards through the gas station parking lot. Mr. Coffman's vehicle is a 2007 Toyota sedan bearing Indiana Plate [REDACTED]. The vehicle description was entered into the CAD history.

Videos obtained from the Arco station and the Florance Fay apartment building on the east side of S. Rural St. show Mr. Coffman arrive with the vehicle and park in front of the business doors and go inside. Nearly thirty minutes pass when a white male in a dark gray unzipped hoodie, tan camo shorts and black shoes can be seen walking northwest bound on Southeastern Ave, crossing S. Rural St, walking across the Arco lot and to the parked car where he opened the driver's door, got inside, and closed the door. Mr. Coffman immediately ran from the building to the car. As the subject was already behind the wheel of the car, Mr. Coffman reached inside the vehicle toward the man in the driver's seat. At that time the vehicle accelerated heavily in

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Anthony D. Johnson

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AFFIANT

DATED: May 2, 2024

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**From:** Anthony D. Johnson

reverse from the front of the building and through the lot towards Rural St. Mr. Coffman is visibly dragged as he hangs from the driver's window and his left arm appearing stuck inside. As the vehicle fled in reverse, it appears to swerve towards the farthest fuel pump from the building. Mr. Coffman appears to be struck against the protective barriers of a pump island, or the pump itself, causing him to fall from the window of the vehicle to the ground. It appears the driver's front tire rolls over Mr. Coffman's body after he fell to the ground. The driver of the vehicle did not stop and continued out of the lot and fled southbound on S. Rural St. from the location.

Shane Coffman was transported to Eskenazi Hospital in critical condition where he succumbed to his injuries at 3:20pm.

Speedway PD Officer Adam Bandy advised he checked county wide runs on his in-car computer and observed an active run being investigated by IMPD involving the stolen 2007 Toyota Camry bearing plate [REDACTED]. Ofc. Bandy checked a license plate reader (LPR) program and observed the vehicle exited W/B I-70 at Holt Rd at 2:36pm. He drove to the area of Cossell Rd and Grande where he parked at Allison transmission to observe traffic. He then checked the LPR again and saw the Toyota Camry was E/B W. Vermont St at N. Lynhurst Dr. at 2:47pm. Shortly thereafter, he saw the Toyota drive by his location.

He followed the vehicle for a short time and confirmed the license plate to be [REDACTED]. When Assisting officers arrived Ofc. Bandy initiated a traffic stop at 2:56pm. The vehicle stopped and the driver was taken into custody at West 10<sup>th</sup> Street and Holt Road. The driver was identified as Chad Martin, white male, DOB: 01/09/1991. Through a BMV check, the vehicle was found to be registered to Shane Coffman.

Ofc. Bandy advised although Chad Martin was read the Miranda Warning, he was not questioned. Martin stated to the officers present, "This is my vehicle" and "Just got my vehicle I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Anthony D. Johnson

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back from a guy”. Without being asked questions, Martin told Speedway officers on BWC, “The car was stolen from me, that’s how I had the keys”. Martin also stated, “Sir, I told the guy this is my car and I want it back.”

The clothing worn by Chad Martin was a grey hooded jacket/sweater, tan camouflage cargo shorts, and black shoes which matched that of the male in the Arco video getting into the 2007 Toyota Camry sedan.

Chad Martin was transported by Officer Bandy to the IMPD homicide office located in the City County Building at 50 North Alabama Street.

Chad Martin was read the Miranda Warning from the form by Det. Johnson. Martin was then provided the form to read for himself, as he stated he could read and understand the English language. Mr. Martin signed the form and agreed to speak with Det. Johnson.

When asked about the fact he was stopped by Speedway Police he advised the car was his. Martin stated he may be a victim of identity fraud and that someone may be buying cars in his name. He entered a car into the “Melissa App” and the app advised the car was in his name, so he drove it away. Based on review of available video, Martin never used his phone while visible in the lot of the Arco station or while walking along the streets nearby. Martin denied hurting anyone on this day and denies harming anyone in his life. Det Johnson then clarified that he did not hurt anyone today, either intentionally or unintentionally or because of his actions, and Martin stated he hopes not. He went on to say if he did anything he does not know what he did.

Det Johnson directly asked where Martin was at when he picked up the car. Martin stated he was released from jail today on an arrest a few days ago. Det Johnson asked if he found the car

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shortly after leaving the jail. He stated, "Sort of". Det Johnson asked where that was at when he found the car and he said, "At a gas station". Martin ultimately requested an attorney and the questioning ended.

Indiana BMV records show Chad Martin has not had a vehicle registered to him since 2011.

On April 30, 2024, the autopsy was conducted by Dr. John Cavanaugh, a pathologist, at the Marion County Coroner's Office. Det. Gary Toms observed the autopsy. At completion, Dr. Cavanaugh advised Det Toms Mr. Coffman died from multiple blunt force trauma injuries specifically the liver was torn in half, his neck was broken, as well as broken ribs, pelvis, and hip. Dr. Cavanaugh did not decide on a manner of death.

Det. Johnson received a latent fingerprint identification report from Det Brian Wills who conducted the latent examination. The report states a print recovered from the front interior driver's side window of the 2007 Toyota was matched on comparison to the #09 finger of Chad Martin DOB:01/09/1991.

All events occurred in Marion County, Indiana.

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/s/ Anthony D. Johnson

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