

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

**IN THE MARION SUPERIOR COURT
CRIMINAL DIVISION**

Cause No: 49D32

STATE OF INDIANA)
)
vs.)
)

INFORMATION

COUNT I

NEGLECT OF A DEPENDENT RESULTING
IN DEATH

I.C. 35-46-1-4(a)(1) and I.C. 35-46-1-4(b)(3)
A LEVEL 1 FELONY

COUNT II

NEGLECT OF A DEPENDENT RESULTING
IN DEATH

I.C. 35-46-1-4(a)(2) and I.C. 35-46-1-4(b)(3)
A LEVEL 1 FELONY

COUNT III

NEGLECT OF A DEPENDENT RESULTING
IN SERIOUS BODILY INJURY

I.C. 35-46-1-4(a)(1) and I.C. 35-46-1-4(b)(2)
A LEVEL 3 FELONY

COUNT IV

NEGLECT OF A DEPENDENT RESULTING
IN SERIOUS BODILY INJURY

I.C. 35-46-1-4(a)(2) and I.C. 35-46-1-4(b)(2)
A LEVEL 3 FELONY

COUNT V

NEGLECT OF A DEPENDENT RESULTING
IN BODILY INJURY

I.C. 35-46-1-4(a)(1) and I.C. 35-46-1-4(b)(1)
(A)

A LEVEL 5 FELONY

COUNT VI

FAILURE TO MAKE REPORT

I.C. 31-33-22-1(a)

A CLASS B MISDEMEANOR

**TAMMY HALSEY W/Female
DOB 7/23/1970**

Co-Defendant with:

**TONI MCCLURE
49D32-2404-MR-010494**

**RYAN SMITH
49D32-2404-F1-010502**

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

Between May 1, 2021 and April 9, 2024, TAMMY HALSEY, being at least 18 years of age and having the care of Kinsleigh Welty, a dependent less than 14 years of age, did knowingly place said dependent in a situation that endangered the dependent's life or health and which resulted in the death of Kinsleigh Welty;

COUNT II

Between May 1, 2021 and April 9, 2024, TAMMY HALSEY, being at least 18 years of age and having the care of Kinsleigh Welty, a dependent less than 14 years of age, did knowingly cruelly confine said dependent and which resulted in the death of Kinsleigh Welty;

COUNT III

Between May 1, 2021 and April 9, 2024, TAMMY HALSEY having the care of Kinsleigh Welty, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health; and that said act resulted in serious bodily injury to said dependent, to-wit: malnourishment;

COUNT IV

Between May 1, 2021 and April 9, 2024, TAMMY HALSEY having the care of Kinsleigh Welty, a dependent, did knowingly cruelly confine said dependent; and that said act resulted in serious bodily injury to said dependent, to-wit: malnourishment;

COUNT V

Between September 1, 2023 and April 9, 2024, TAMMY HALSEY having the care of Kinsleigh Welty, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health; and that said act resulted in bodily injury to said dependent, to-wit: lice infestation;

COUNT VI

Between May 1, 2021 and April 9, 2024, TAMMY HALSEY, being required to make a report under I.C. 31-33-5-1, did knowingly fail to make said report;

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

May 24, 2024

Date

RYAN MEARS

Marion County Prosecutor
19th Judicial Circuit

/s/ Andrew M. Sweet

Andrew M. Sweet, #34218-29
Deputy Prosecuting Attorney

State's Witnesses:

LOGAN BENNETT
VINSON TERRY BOYCE
SAMONE BURRIS
JAMIE DAVIS
TIMOTHY DILLMAN
NICOLLE CASSANDRA FLYNN
MEGAN GILLIAM
CAITLIN M HARRIS
CHRISTOPHER HUDSON
AMBER JAYNES
ANGELICA LEON
BRANDON KYLE MILLS
SHANE AUSTIN NICHOLSEN
JASON EDWARD RAKASKA
AMANDA SMET
WHITNEY WELLS
RYAN WRIGHT
WILLIAM VASQUEZ
Jenna Amundson, DCS FCM
Sharon Berry
J.B.
M.B.
Kristen Bryant, DCS
J.B.
Courtney Carr, FCM
M.C.
K.C.
V.G.
D.H.
J.H.
Dermita Johnson, FCM
C.L.
Eryan Majors, FCM
L.M.
A.S.
Edel Senfeld
Natalie Shepler, FCM
D.S.
M.S.
B.W.
P.W.

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

On April 9th, 2024, Detective Shane Nichol森, 40845, of the Indianapolis Metropolitan Police Department (IMPD) Child Abuse Unit was notified to contact IMPD Officer Ryan Wright, 40098.

Officer Wright advised he had responded to a death investigation at 6519 Denver Drive, Indianapolis, IN 46241. Upon arrival, Officer Wright observed medical personnel performing life-saving measures on the victim, Kinsleigh Welty (5 years old), inside of the house on Denver Drive. Officer Wright advised that Kinsleigh's mother, Toni McClure (29 years old), stated she had just picked up Kinsleigh after she spent the last 1 ½ months with her father, B.W. Officer Wright advised Toni stated Kinsleigh had a headache, and that her legs had been trembling. Toni stated that when they arrived home, Kinsleigh collapsed onto the floor. Officer Wright stated Toni called for emergency services after approximately 20 – 30 minutes. Officer Wright observed a bruise on Kinsleigh's face and noted that it appeared Kinsleigh was malnourished.

Wayne Township EMS # 81 transported Kinsleigh to Riley Hospital for Children. Riley Hospital Physician, Dr. Anne Whitehead, confirmed Kinsleigh deceased at 6:01 PM.

IMPD Child Abuse Unit, Detective Jamie Davis, 33139, and Detective Caitlin Harris, 41652, responded to the house and observed two vehicles parked at the trailer home. The vehicles were identified as a white Chevrolet pick-up truck, South Carolina license plate # TIE218, and a blue Suzuki sedan, Indiana license plate # 225CRW.

On April 9th, 2024, Detective Nichol森 applied for and was granted a search warrant, reference cause # 49D28-2404-MC-009907, to search the trailer home and both vehicles on Denver Drive for various items of evidentiary value. Another search warrant was later granted, reference cause # 49D17-2404-MC-009925, for additional items observed inside of the house. Detective Harris applied for and was granted a search warrant, reference cause # 49D19-2404-MC-009917, for the detached shed on the property.

On April 9th, 2024, Detective Nichol森 responded to Riley Hospital for Children. Department of Child Services (DCS) Family Case Manager (FCM) Natalie Shepler was also present at the hospital. Detective Nichol森 observed Kinsleigh's body. Detective Nichol森 noted the following:

It appeared Kinsleigh was severely malnourished. Kinsleigh was thin and her eyes were sunken. Kinsleigh had what appeared to be fecal matter on various parts of her body including the bottom of her feet and in her hair. The fecal matter had matted to her hair and to the bottom of her feet. Kinsleigh had what appeared to be lice or other similar-type tiny insect crawling on her face and in her hair. Kinsleigh's hair was very short in length and appeared very thin. There were also what appeared to be bites or other unknown sores on Kinsleigh's abdomen area.

(PHOTO OF KINSLEIGH WELTY REDACTED FROM PUBLIC VERSION)

Medical personnel at Riley Hospital had concern for malnourishment and other neglect-related issues due to the initial observations of Kinsleigh's body. It was advised that Kinsleigh weighed more at 2 ½ years old than what she had just weighed in at 5 years old.

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

/s/

DATED: April 14, 2024

On April 9th, 2024, Marion County Coroner's Office (MCCO) Deputy Coroner Amber Jaynes arrived at the hospital and performed an external examination of Kinsleigh. Deputy Coroner Jaynes also had concern that Kinsleigh was malnourished. Deputy Coroner Jayne took possession of Kinsleigh's body and clothing.

On April 9th, 2024, Detective Nicholsen interviewed Kinsleigh's mother, Toni McClure, at Riley Hospital. Toni stated the following during the interview –

Toni stated she had been living at 6519 Denver Drive for the past six months. Toni stated Kinsleigh was one of three children she had with their father, B.W. The other children were B.W. age 6 and P.W., age 4. She also had a newborn, H.S. with Ryan Smith, her boyfriend. Toni stated she had been married to B.W. since 2017, but they had been separated for the last 3 – 4 years. Toni explained that B.W. had previous issues with heroin, but that he recently had been doing better. Toni stated B.W. asked to have Kinsleigh stay with him. Toni agreed, and in early-to-mid February, she dropped Kinsleigh off with B.W. at the McDonald's, located near W. 16th Street / Lafayette Road. Toni stated that she spoke to Kinsleigh regularly during that time, but it was only through audio phone calls. Toni explained that earlier the day of the interview, B.W. had called her and told her that she needed to take Kinsleigh back because he could not keep Kinsleigh due to a work obligation in Carmel, IN. Toni stated she met B.W. at the same McDonald's and took Kinsleigh back. Toni stated that Kinsleigh entered the vehicle and took off the hood of her coat. Toni stated she observed that Kinsleigh's hair had been cut and was matted. Toni described Kinsleigh's hair as "hard." Toni stated she also observed that Kinsleigh had a bruise on the side of her face. Toni stated Kinsleigh looked terrible and that she had lost a lot of weight. Toni stated Kinsleigh had complaint of pain to her head and legs, and that her legs were trembling. Toni stated she arrived home and carried Kinsleigh to the entrance of their home. Toni stated she put Kinsleigh down and she immediately collapsed inside of the house. Toni stated that only 20 – 30 minutes had elapsed from the time she picked Kinsleigh up until she collapsed at her home. Toni stated she began CPR on Kinsleigh at that time. Toni stated Kinsleigh had a lot of liquid that kept coming out of her mouth. Toni stated Kinsleigh just kept gurgling. Toni stated she did call her current boyfriend's mother, M.S., to come pick her other children up during that time. Toni stated she eventually called for emergency services and continued CPR until medical personnel arrived at the house.

Toni could not provide an address or where exactly Kinsleigh had been staying with B.W. Toni also did not have a good phone number to contact B.W. Toni stated Kinsleigh had previously been diagnosed with mild dwarfism and a "floppy trachea." Toni stated that caused the food that Kinsleigh ate to be trapped in her lungs. Toni stated Kinsleigh was put on a feeding tube for some time, but Riley Hospital removed it when she was around 2 years old. Toni stated Kinsleigh had no current medical conditions that required medication or caused any further issues. Toni stated Kinsleigh was last medically evaluated in December of 2022. Toni stated a DCS employee had just been at her house earlier that day because her newborn had tested positive for THC. Toni stated she picked up Kinsleigh after DCS visited the house.

After the conclusion of the interview, Detective Nicholsen explained that he would be seizing her cellular phone as part of the investigation. Toni stated her phone was still at the house. Toni described the phone to be an Apple iPhone with a white case. Toni provided Detective Nicholsen with the passcode to the phone.

Detective Nicholsen learned from FCM Shepler there had been multiple DCS reports / assessments for various incidents of neglect that involved Kinsleigh and / or Toni. It appeared that DCS had difficulty locating Kinsleigh to conduct several of the more recent DCS investigations.

/s/

DATED: April 14, 2024

On April 9th, 2024, Detective Nichol森 responded to 6519 Denver Drive and met Detective Davis who had been at the scene. Indianapolis-Marion County Forensic Services Agency (I-MCFSA) Crime Lab Technicians (CSU) had also responded to the house to assist with the evidence documentation / collection.

CSU Technicians took photographs and recorded video of the house. CSU Technicians collected various clothing items, towels, and other items with potential biological evidence. CSU Technicians also collected lice shampoo from the trunk of the blue Suzuki sedan. Toni's Apple iPhone was located on the kitchen counter. While Detective Davis was at the house, Toni's mother, Tammy Halsey, grandmother, J.B., and great-aunt, V.G., arrived. It was discovered that they had heard a different version of events for what happened earlier that day between Toni and Kinsleigh. The version of events that were provided was distinctly different from what Toni had just explained to Detective Nichol森 at the hospital. This included that B.W. was not involved with what happened.

Specifically, Detective Davis learned the following from Tammy and J.B. – J.B. stated Tammy had told her that Kinsleigh had fallen in the bathtub and that Kinsleigh was gone. Tammy stated she learned Kinsleigh had fallen in the bathtub from her other daughter / Toni's sister, L.M. Tammy stated L.M. told her that Toni had walked away from the bathroom and when she came back, Kinsleigh was underneath the water. Tammy stated Toni tried to do CPR, but it was unsuccessful. Tammy stated Kinsleigh's father, B.W., was not involved and had not been involved with Kinsleigh for some time. Tammy stated B.W. had not had contact with any of the children because he was in-and-out of rehab. Tammy stated B.W. would not even know what the children would look like, and she did not know where B.W. was located. Tammy also stated the children had been staying with Toni's boyfriend, Ryan, for some time.

Detective Davis also spoke to several of Toni's neighbors, A.S., and M.C. They had cameras that motion-recorded footage of the front area of Toni's trailer home.

On April 10th, 2024, Detective Nichol森 went to a house in the 2900 block of Roberta Drive. This address was what B.W. had most recently listed on his Indiana BMV ID / license. Upon arrival, Detective Nichol森 met C.L. C.L. stated the following during the interview –

C.L. stated B.W. was a friend she had known for approximately 7 years. C.L. explained she had lived at that house for the last 14 years. C.L. stated it had been about one year since B.W. lived there at the house, but he still consistently visited the house. C.L. stated that B.W. had just been over at the house, earlier on April 9th, 2024, at around 5:00 PM. C.L. stated that B.W. did not appear as if he had seen the children including Kinsleigh for some time. C.L. stated B.W. would have told her immediately if he had seen any of the children because he struggled with not being able to see them regularly. C.L. believed B.W. had been with a girlfriend when he visited the house. C.L. believed they had been in a small, red, cube-style vehicle. C.L. stated B.W.'s children had not been at the house, and she had not seen them in a couple of years. At the end of the interview, C.L. allowed Detective Nichol森 into the home. Detective Nichol森 did not observe any issues within the home. It did not appear B.W. lived at the address.

On April 10th, 2024, Detective Nichol森 responded back to 6519 Denver Drive to continue with the execution of the search warrant at the house. Detective Davis had remained at the house while Detective Nichol森 went to the house on Roberta Drive.

/s/

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Detectives and CSU Technicians observed the back bedroom had bunk beds and appeared to be the bedroom belonging to the two boys. The closet door had been blocked with a large dresser. The dresser was moved away from the door. Detective Nichol森 opened the closet door and immediately smelled the strong odor of urine and feces that emanated from the interior of the closet. Detective Nichol森 observed what appeared to be human fecal matter on the carpeted floor and along the walls of the closet. There were small clothing items that appeared to belong to a young female child. These clothing items were heavily soiled. There had been what appeared to be small handprints on the interior of the closet door. These handprints appeared to be marked with fecal matter. Additionally, there were three Ensure protein bottles that were empty on the floor of the closet. The expiration dates for the Ensure protein drinks were dated for February and March of 2025. Detective Nichol森 observed what was discovered to be white bread with peanut butter laid on the floor. The sandwich had not been eaten. The bread was noted to be dry / hard, but it appeared otherwise fresh since there was no mold found on the sandwich. CSU Technicians began to collect the clothing from the closet. Detective Nichol森 observed what appeared to be more human feces that was located with a hot dog bun underneath one of the clothing items. CSU Technicians took additional photographs and recorded a video of the closet which was measured to be approximately 5' by 3'. CSU Technicians also collected the clothing items from inside the closet.

Detectives and CSU Technicians located what appeared to be the same peanut butter in one of the kitchen cabinets. There was an empty package of white bread that was laid on the top of the trash in the kitchen. The expiration date for the bread was April 6th, 2024. There was peanut butter smeared on the outside of the bread packaging. It appeared to be the same bread used for the sandwich in the closet. There were also hot dog buns that appeared to be the same as what had previously been found in the closet. These hot dog buns were also in one of the kitchen cabinets. Detective Davis also located a vacuum with what appeared to be feces inside of the vacuum's canister. The contents of the vacuum were emptied and documented.

DCS members had made detectives aware of various inconsistencies in Toni's version of events. This included that Toni had told the DCS case worker that had visited the house earlier on April 9th, 2024, that Kinsleigh was with her grandparents instead of with B.W.

Additionally, FCM Shepler stated she had located Toni's boyfriend, Ryan Smith, and several of Toni's children in Plainfield. Ryan initially told FCM Shepler that the children had been with him in Plainfield for the last several days, but Ryan admitted that was a lie that Toni's mother, Tammy, had told him to tell police / DCS. IMPD officers had also noted several inconsistencies with what Toni had told them versus what Toni had told detectives / DCS.

While detectives processed the scene, Toni had voluntarily talked with Officer Timothy Dillman, 42189, and Officer Logan Bennett, 44186, about the closet. Officer Dillman advised that there was a closet in the house that one of her sons would use to urinate / defecate on the floors and walls. Officer Dillman advised Toni told them that her son had seizures and that was what he would do when the seizures occurred.

On April 10th, 2024. Detective Nichol森 requested Toni come back with detectives to the Child Abuse office. Toni had been asleep inside of her car during the execution of the search warrants. Toni agreed, and with the assistance of IMPD Southwest District officers, Toni was transported to the Child Abuse office.

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On April 10th, 2024, Detective Nichol森 and Detective Davis interviewed Toni McClure at the Child Abuse office. Detective Nichol森 read Toni her Miranda Warning to which she stated she understood. Toni agreed to speak with detectives further about the case. Toni signed the Advice and Waiver of Rights form. Toni stated the following during the interview –

Toni provided various versions of events and explanations for everything that had happened with Kinsleigh. Eventually, Toni admitted that she had lied to detectives about the version of events with B.W. Toni stated B.W. was not involved in any manner, and that he had not been involved with the children for over one year. Toni stated B.W. likely had no knowledge that Kinsleigh had even died.

Toni stated she had been Kinsleigh's primary caregiver. Toni stated her mother, Tammy, helped watch Kinsleigh at times. Toni felt that Tammy shared some of the responsibility for what happened to Kinsleigh because she knew everything, but she never helped or did anything. Toni stated Ryan was a great guy, and he and his family had nothing to do with it. Toni expressed that she was always with Kinsleigh. Toni stated nobody would help her when she asked for help with Kinsleigh. Toni stated Ryan never paid attention to Kinsleigh, even though he lived at the house and was there every day / night. Toni stated Ryan never put Kinsleigh into the closet or interacted with her while she was in there. Toni stated Ryan had never physically assaulted Kinsleigh. Toni stated Tammy brought it up to her that Kinsleigh did not look well and had lost weight. Toni expressed that Tammy and Ryan told her that Kinsleigh needed help and that she would die if she did not fix how she treated Kinsleigh. Toni stated a few months ago, Tammy, and her sister, L.M., did take Kinsleigh to give her a break. Toni stated that while L.M. had Kinsleigh, Kinsleigh had smeared feces in her bathroom. Toni stated she did not understand why everyone said Kinsleigh drowned. Toni stated she had just communicated with Ryan that Kinsleigh had fluids in her airway when she started CPR. Toni stated she also communicated with her sister, L.M., that she could not get Kinsleigh to breathe. Toni stated L.M. told her to do CPR on Kinsleigh.

Toni explained how Kinsleigh was asleep and underneath the blanket in one of the back rooms when DCS was at the house just before Kinsleigh died. Toni stated DCS did not check that room. Toni stated she had also lied and told DCS that Kinsleigh was with her grandparents. Toni lied to DCS because she knew that it would not have been good if DCS saw Kinsleigh. Toni stated DCS had just been at the house a month or so earlier, and they took a picture of Kinsleigh. Toni stated DCS did not express any concern with Kinsleigh at that time.

Toni explained Kinsleigh had a lot of behavioral issues. Toni discussed the various issues with Kinsleigh's behavior. Toni stated Kinsleigh hated her. Toni stated she did not get Kinsleigh help because she was scared to get into trouble. Toni explained she did not want her other children to be taken away because of Kinsleigh. Toni stated Kinsleigh had resentment towards her because she had been taken away by DCS earlier in her life. Toni stated she and Kinsleigh did not share a connection or bond. Toni was apologetic for lying to detectives. Toni stated she was going to go to jail. Toni stated Kinsleigh needed help, but she did not help. Toni stated she had "fucked up really bad." Toni explained that it was true that Kinsleigh had told her that her head and legs hurt right before she collapsed in the kitchen and died. Toni stated she was not going to lie, Kinsleigh told her that she wanted to die just prior to her death. Toni believed Kinsleigh died because of malnourishment. Toni stated she did not know Kinsleigh had the lice until she began the CPR. Toni stated she just assumed that it was feces in her hair prior to the CPR. Toni stated a few weeks ago, she cut Kinsleigh's hair because of the feces in her hair. Toni explained that she never looked at Kinsleigh close enough to see the bugs on Kinsleigh.

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Toni admitted that for at least the last few months, she had routinely put Kinsleigh in the back closet that detectives had discovered. Toni stated her memory for timelines was not great, so it had likely been longer than just a few months. Toni stated Kinsleigh physically declined over the last several months, but she did not help because she did not want to lose her other children or get into trouble. Toni stated she neglected Kinsleigh. Toni stated Kinsleigh was let out of the closet every day for a short time when she went somewhere, but Kinsleigh did spend most of the time in the closet. Toni stated when they returned from somewhere, Kinsleigh would just go back to the closet on her own. Toni stated it was just easier to keep Kinsleigh in the closet because she did not have to deal with her while she was in there. Toni stated Kinsleigh would sit in the closet and talk to herself. Toni stated Kinsleigh would yell for her and tell her she was hungry and thirsty. Toni stated that Kinsleigh expressing that she was hungry or thirsty became her “slogan.” Toni explained how she recently struck Kinsleigh in the face with her hand because Kinsleigh bit her arm. Toni stated she knew that the way she had treated Kinsleigh was likely to lead to her death, but she did not want to believe that would happen. Toni stated she did the “bare fucking minimum” for Kinsleigh, and she expressed the desire for Kinsleigh to be out of her life. Toni stated she had wished that Kinsleigh was never born. Toni explained that she had only been providing Kinsleigh one small meal a day. Toni admitted she had given up on Kinsleigh. Toni repeated that she had failed Kinsleigh. Toni stated she knew that everything she had done to Kinsleigh was wrong.

It should be noted that Toni had prior conviction (2018) in Morgan County, IN, for Neglect of a Dependent – F6, reference cause # 55D03-1812-F6-002069.

On April 10th, 2024, Detective Nicholsen contacted Toni’s boyfriend, Ryan Smith. Ryan agreed that he and his mother, M.S., would meet detectives at the Child Abuse office.

On April 10th, 2024, Detective Nicholsen and Detective Davis interviewed Ryan Smith at the Child Abuse office. Detective Nicholsen read Ryan his Miranda Warning to which he stated he understood. Ryan agreed to speak with detectives further about the case. Ryan signed the Advice and Waiver of Rights form. Ryan stated the following during the interview –

Ryan stated that around 3:30 PM, he picked B.W. (the six-year-old) up from school and returned to his family’s shop. Ryan stated that around 4:15 – 4:20 PM, he received a phone call from Toni to come to the house to pick up all the children because Kinsleigh was dead. Ryan explained he went to the house with his mother and picked up the children. Ryan stated Toni had told him that Kinsleigh had drowned, but he did not visibly see Kinsleigh while he was in the house to get the other children. Ryan stated Toni was on the phone with dispatch while he and his mother were getting the kids from the house. Ryan explained that as they were leaving, he observed the emergency services headed to the house. Ryan stated there were text messages between him and Toni about the case because he had told her to call 911 after she first told him something happened with Kinsleigh.

Ryan outlined the dynamics and situation with Kinsleigh since he entered an intimate relationship with Toni approximately one year ago. Ryan discussed the various issues with Kinsleigh’s behavior. Ryan stated Kinsleigh hated him because she wanted her real father. Ryan confirmed they had lived at the house on Denver Drive for around 6 – 7 months. Ryan stated his parents had not seen Kinsleigh since around Christmas of 2023, but Toni’s mother, Tammy, took care of Kinsleigh often on the weekends. Ryan stated Tammy took Kinsleigh because Kinsleigh did not always go with

/s/

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them to family ventures. Ryan stated Kinsleigh was not allowed to be around his family because she had told them that his father told her to pull down her pants down. Ryan stated that was not true.

Ryan stated Toni decided it would be best to put Kinsleigh into the closet because it was safer for everyone else. Ryan stated she started to put Kinsleigh into the closet around Thanksgiving of 2023. Ryan stated that in the last 3 – 4 months, he had only observed Kinsleigh out of the closet about 10 times. Ryan stated Toni would let Kinsleigh out periodically for an hour or two, but she would have to go back into the closet. Ryan stated that about 4 – 5 months ago, he became upset with Toni about the way Kinsleigh looked and acted. Ryan explained Kinsleigh had deteriorated. Ryan expressed to Toni that she needed help because she had lost too much weight and threatened that he would call 911 if Kinsleigh did not get help. Ryan stated Toni was scared to get Kinsleigh help because she did not want to get into trouble. Ryan stated he had last cleaned the closet about a month prior to the interview. Ryan stated when he saw the condition of the closet he thought, “Oh my God.” Ryan explained there were piles of feces in the corners. Ryan told Kinsleigh to quit pooping on the floor and then they could change this.

Ryan stated he continued to express the issues with everything to Toni, but Toni was scared to do anything else about it. Ryan stated he did not seek any medical attention for Kinsleigh because of his love for Toni. Ryan explained he never interacted with Kinsleigh or fed her while in the closet. Ryan stated Kinsleigh would scream and call everyone names when she went into the closet. Ryan stated he would observe Toni bring Kinsleigh food every night, but he was not sure if she ate the food or what happened. Ryan said Kinsleigh would ask the boys to get her something, like a toy. Ryan thought B.W. might be taking her drinks, granola bars, or crackers, but the kids are not allowed food outside the kitchen.

Ryan believed Kinsleigh died of malnourishment. Ryan felt that he should be punished, but not to the same level or extent as Toni. Ryan stated he told Toni that Kinsleigh would die if they did not change how she was treated.

On April 10th, 2024, IMPD Detective Vinson Boyce, 30671, and Detective Harris attended Kinsleigh’s autopsy at the Marion County Coroner’s Office.

Dr. Geunyoung Jung and Dr. Amanda Paul conducted the autopsy of Kinsleigh. Detective Boyce and Detective Harris observed what appeared to be lice covering Kinsleigh’s hair, face, and body. Kinsleigh weighed 21lbs at 38 ½ inches tall. Dr. Jung noted bruising around Kinsleigh’s right eye and cheekbone Dr. Jung noted in the internal examination that Kinsleigh’s intestines contained a light pink fluid and no solid fecal matter. Dr. Jung noted Kinsleigh’s stomach contained less than 5 millimeters of stomach fluid. Dr. Jung and Dr. Paul provided that the preliminary cause of death was likely to be ruled malnutrition. Dr. Jung and Dr. Paul also provided that the preliminary manner of death was likely to be ruled neglect.

On April 10th, 2024, Detective Nichol森 placed Toni and Ryan under arrest. Public Safety Officer (PSO) Miles Copeland, 45508, transported Toni and Ryan to the Criminal Justice Center (CJC).

Ryan had been in possession of an Apple iPhone at the time of his arrest. The phone was seized as evidence. IMPD Detective Daniel Hiser, 40242, transported Toni and Ryan’s phones to the IMPD Property Room to be held as evidence.

On April 10th, 2024, IMPD Child Abuse Unit, Detective Sgt. Nicolle Flynn, 21212, forensically interviewed

/s/

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Kinsleigh's brother, P.W. (4 years old). P.W. stated the following during the interview –

P.W. was unable to provide his age, and he had difficulty paying attention. P.W. described all the people that lived in the house with him. Faces were drawn on the white board to represent all the people that P.W. said lived with him.

P.W. later wanted to change his mother's face to a sad face. P.W. explained that Kinsleigh stayed at the house. P.W. stated that made Kinsleigh sad. P.W. stated his mother had smacked Kinsleigh. P.W. stated his mother smacked Kinsleigh on the butt because she was in time-out. P.W. described that Kinsleigh was in trouble because she had escaped the "cage." P.W. stated Ryan became angry about Kinsleigh. P.W. stated Ryan was mad and he smacked Kinsleigh when she was on time-out in the cage. P.W. stated Kinsleigh liked to eat bread. P.W. stated Kinsleigh had escaped from the "wall." P.W. explained that Kinsleigh did not have anything to play with while in the wall, but that she pooped in the cage. P.W. stated Kinsleigh made them sad and would be in time-out all day.

On April 10th, 2024, Detective Sgt. Flynn forensically interviewed Kinsleigh's brother, B.W. (6 years old). B.W. stated the following during the interview –

B.W. stated he had a sister, Kinsleigh, that lived in the house with him. B.W. stated that when he gets in trouble, he gets sent to the "corner." B.W. stated all the children must go to the corner. B.W. stated Kinsleigh has a different corner that she went to when she was in trouble. B.W. stated it was where the door was. B.W. stated nobody else had to go where Kinsleigh went. B.W. stated Kinsleigh had to stay in the corner for 12 minutes, but then she has to go back to the closet. B.W. stated Kinsleigh stayed in the closet of the bedroom that he slept in with bunk beds. B.W. stated Kinsleigh slept on the ground. B.W. stated Kinsleigh pooped in the closet. B.W. explained that Kinsleigh would get a sandwich when all the other children would get pizza. B.W. stated Kinsleigh did not get pizza because she was bad.

B.W. stated Kinsleigh would be in trouble because she would get into stuff. B.W. stated Kinsleigh would get out of the closet and tap him, but then he would tell his mother. B.W. stated his mother would put Kinsleigh into the corner and then back into the closet. B.W. stated Kinsleigh does not go anywhere except for the closet.

B.W. stated Kinsleigh had said bad words to him while she was inside of the closet. B.W. stated Kinsleigh said stupid words. B.W. explained that Kinsleigh never left time-out. B.W. stated he last saw Kinsleigh before he went to his grandma and papaw's, and he expressed that Kinsleigh looked really bad. B.W. stated he would play on his PlayStation, but Kinsleigh played with nothing because she was bad. B.W. stated Kinsleigh did go with him and his mother when they dropped him off at school. B.W. explained what Kinsleigh ate while she was in the closet. B.W. stated his mother brought her a sandwich. B.W. stated Kinsleigh did not get anything else except for one sandwich a day. B.W. stated Kinsley would ask their mother for a drink, but his mother never got her a drink. B.W. explained his mother did not go to Kinsleigh when she asked for her, and if she did, she would tell Kinsleigh no when she asked for a drink. B.W. explained Kinsleigh could not get out of the closet because there was a lock on the door. B.W. stated he had been 6 years old when Kinsleigh went into the closet. B.W. stated it occurred after Thanksgiving but before Christmas (2023).

On April 10th, 2024, Detective Sgt. Flynn forensically interviewed Kinsleigh's brother, J.H. (11 years old). J.H. stated the following during the interview –

J.H. stated he goes to his mother's house every day after school, but he lived with his grandfather, D.H., at his house. J.H. appeared extremely hesitant to talk about what really had been happening at his mother's house. J.H. claimed he did not know anything when asked various questions. Sgt. Flynn advised J.H. that Kinsleigh was very sick, and that she was at the hospital. J.H. became very emotional and upset at that time. The interview was concluded.

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After the conclusion of J.H.'s forensic interview, Lisa Brown with the IMPD Victim Assistance Unit, met with J.H. and informed him of Kinsleigh's death and his mother's arrest. J.H. became very emotional, and he told Lisa that he felt guilty about what happened to Kinsleigh. J.H. stated he had lied to Sgt. Flynn about what had been happening with Kinsleigh.

On April 10th, 2024, Detective Nicholsen interviewed Ryan's mother, M.S., at the Child Abuse office. M.S. stated the following during the interview –

M.S. stated she had received a call to return to their business as soon as possible. M.S. went to the business / shop and met with Ryan and B.W. M.S. stated Ryan told her that Toni had just called him upset because Kinsleigh was unresponsive / dead. M.S. stated Toni had actually called Ryan's cousin, C.S., because Ryan did not initially answer his phone, but Cody gave the phone to Ryan to speak with Toni. M.S. stated she, Ryan, and B.W., went to the house on Denver Drive. M.S. stated at that point, DCS had already been at the house, and it was believed that whatever happened to Kinsleigh happened after DCS had been at the house. M.S. stated Toni wanted them to pick up all the other children because Kinsleigh was unresponsive. M.S. stated Ryan immediately went into the house and retrieved their newborn baby and took her to the car. M.S. stated she went inside and observed Toni just standing inside of her bedroom. M.S. stated Toni did not say anything, she just stood there with a blank stare. M.S. stated she did not observe Kinsleigh inside of the house, so she asked Toni where Kinsleigh was located. M.S. explained that Toni told her that she was in the back bedroom laid on the bed and underneath a blanket. This was the same room that the closet was located. M.S. stated she was under the impression that Kinsleigh was already dead at that time. M.S. stated she and Ryan then took the rest of the children back to her house in Plainfield, IN. M.S. denied any further knowledge about what had occurred with Toni and Kinsleigh.

M.S. stated she had last seen Kinsleigh for her birthday in early-December of 2023. M.S. stated Kinsleigh did not look right. M.S. explained that Kinsleigh's hair was thin and raggedy, and the color of her skin was not normal. M.S. stated Kinsleigh's face was sunken, but it was harder to observe the weight difference because of the clothing she had worn. M.S. stated Ryan was told that something needed to be done about Kinsleigh's condition. M.S. stated she had first met and observed Kinsleigh in November or December of 2022. M.S. stated Ryan, Toni, Kinsleigh, and the other children lived with her for some time in 2023. M.S. explained Kinsleigh to possibly be bi- polar or have schizophrenia because she would be okay one moment, but then she would completely change. M.S. stated Kinsleigh would wait until everyone went to bed and then get into all the cabinets. M.S. stated they really did not see Kinsleigh after they moved into the house on Denver Drive (October 2023). M.S. stated Toni would not bring Kinsleigh to any family gatherings when she would see the other children.

M.S. stated Ryan had come to the house approximately 6 months earlier and discussed with her the various issues with Kinsleigh and Toni that needed to change. M.S. stated Ryan told her that he dealt primarily with the boys and Toni dealt with Kinsleigh. M.S. stated Ryan had told her that he had experienced nightmares that he would wake up and find Kinsleigh deceased. M.S. stated Ryan was afraid Kinsleigh was going to die. M.S. stated Ryan expressed that the relationship between Toni and Kinsleigh was massively different than the relationship Toni had with her boys. M.S. stated Ryan told her there was resentment from Toni towards Kinsleigh. M.S. stated she had heard Kinsleigh tell Toni and Ryan that she did not like them and that she did not want to be there. M.S. stated Kinsleigh told them she was going to continue to act how she had, and they would just have to deal with it until somebody

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took her away from them. M.S. denied knowledge of the closet and how it was being utilized. M.S. stated Ryan did not come to her about the issues after their long conversation, but she did routinely ask Ryan about Kinsleigh's status. M.S. explained Ryan just told her that everything was moving in the right direction.

On April 11th, 2024, Detective Davis applied for and was granted a search warrant, reference cause # 49D30-2404-MC-010116, to obtain the neighbors' camera footage from the camera company, Wyze Labs, Inc. As of April 15, 2024, the footage has not been received by IMPD.

On April 12th, 2024, Detective Nichol森 was notified that DCS had just received a report with information that involved Tammy and Kinsleigh. Plainfield Community School Corporation, Director of Food Services, K.C., reported the following to DCS –

Tammy is a kitchen manager at an elementary school, and she previously reported information to another employee. Tammy said that while Kinsleigh was staying the night at her home, in order for Tammy to sleep, she had to tie the child to the bed. She did this because Kinsleigh would not stay in bed as she wanted to get up to eat and drink. It is unknown how the child was tied or for how long at a time. It is unknown if the child sustained injuries. Tammy has been managing the kitchen since August and she talked about having the child frequently up until October. It is unknown how many days or nights the child stayed with her.

On April 12th, 2024, Detective Nichol森 interviewed Plainfield Community School Corporation, Director of Food Services, K.C. K.C. stated the following during the interview –

K.C. stated Tammy was one of her food services managers. K.C. stated Tammy had 3 – 4 employees underneath her supervision. K.C. stated the night before, one of Tammy's employees, M.B., called her and told her that Tammy had watched Kinsleigh often in the past. K.C. stated M.B. told her that Tammy had talked a lot at the beginning of the school year about how bad of a child Kinsleigh had been. K.C. stated M.B. told her that Tammy had expressed that she had tied Kinsleigh to the bed, so that she could sleep at night. This was because of how Kinsleigh would get into things at night. K.C. stated M.B. told her that Tammy talked like that about Kinsleigh from August until the end of October. It was implied that Tammy had taken care of Kinsleigh a lot during that time.

K.C. stated she had also talked with Tammy about the situation earlier that day. K.C. stated Tammy told her that she picked up the boys every day after school and will take them back home on Denver Drive. K.C. stated Tammy told her that she would see Kinsleigh everyday when she took the boys back home, but that she never noticed any issues with Kinsleigh losing weight or how she had died. K.C. explained she had also heard from other employees that K.C. had been telling them Kinsleigh drowned. K.C. stated Tammy had not said anything like that to her previously. K.C. confronted Tammy about the drowning story, and Tammy told her that Toni had said that she was giving Kinsleigh a bath, but she walked away and when she did, Kinsleigh drowned in the bathtub. K.C. stated it appeared to her that Tammy was being dishonest when she told her everything that had happened with Toni and Kinsleigh. K.C. stated Tammy just appeared disingenuous about the entire situation, and that Tammy was hiding her involvement from her with the police.

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On April 12th, 2024, Detective Nichol森 and Detective Davis interviewed Tammy's mother, J.B., at the Child Abuse office. J.B. stated the following during the interview –

J.B. stated Ryan had called them and told everyone that Kinsleigh had drowned in the bathtub right after DCS left the house. J.B. stated she did not see Kinsleigh during the eclipse on Monday because she has cancer and has been bedridden. J.B. stated that around Christmas of 2023, she and Tammy observed that Kinsleigh did not look well. J.B. stated it looked like Kinsleigh needed vitamins, but Kinsleigh had baggy clothing on that made it difficult to tell her physical condition. J.B. stated Tammy bought protein shakes for Toni to give to Kinsleigh. J.B. stated Tammy would ask Toni if Kinsleigh was getting her protein shakes. J.B. stated Toni was a monster that deserved the death penalty for what happened with Kinsleigh. J.B. stated there were plenty of family members that would have taken care of Kinsleigh for Toni, but Toni never asked anyone.

On April 12th, 2024, Detective Nichol森 and Detective Davis interviewed Tammy Halsey at the Child Abuse office. Detective Nichol森 read Tammy her Miranda Warning to which she stated she understood. Tammy agreed to speak with detectives further about the case. Tammy signed the Advice and Waiver of Rights form. Tammy stated the following during the interview –

Tammy stated that on Tuesday, April 9th, 2024, she received a text message from Ryan that advised he wanted her to call him. Tammy stated that around 6:30 PM, she called Ryan, and he told her that Toni had been giving Kinsleigh a bath when she walked away from the bathroom. Tammy stated Ryan then explained that Toni told him that when she returned to the bathroom, Toni found Kinsleigh underneath the water and unresponsive. Tammy stated she still believed that to be what happened until the recent media stories had shown what Toni had said to detectives. Tammy stated she had spoken to Toni while she had been in jail, and Toni told her she did not understand why Ryan said it was a drowning. Tammy stated that during her recent conversations with Toni, she had not talked with Toni about what happened. Tammy admitted she told Ryan to lie to the police / DCS about how long he had the other children. Tammy stated she just did not want to lose the other children.

As Tammy explained the events of the past year, it appeared Tammy was trying to minimize her role and participation with everything that happened with Kinsleigh. Detective Nichol森 presented several photographs of Kinsleigh's physical condition at the hospital from the day she died. Tammy did not appear surprised. Tammy admitted she should have done something to get Kinsleigh help when she first noticed that things were not right with Kinsleigh. Tammy stated DCS had been at their house in Mooresville four times looking for Kinsleigh and Toni due to reports on Kinsleigh's condition. Tammy stated she never helped DCS locate Toni for any of the reports. Tammy stated she wanted to give Toni a chance to get everything together for Kinsleigh. Tammy stated she had seen Kinsleigh on Sunday, April 7th, 2024, for a party at L.M.'s house. Tammy stated as soon as Toni arrived, she immediately told Kinsleigh to go to the corner because she was in trouble. Tammy stated Kinsleigh had to stand up and remained faced directly into the corner. Tammy stated Kinsleigh remained like that for as long as she was at the party. Tammy explained that the next day, April 8th, 2024, everyone came to their house in Plainfield for the eclipse. Tammy stated Toni had put Kinsleigh in the corner again in the same manner because Toni said she was in trouble. Tammy stated Kinsleigh remained like that for the several hours of the eclipse. Tammy admitted she would watch Kinsleigh alone at various times when Toni, Ryan, and the rest of the children went somewhere to do things. Tammy stated she watched Kinsleigh twice at Toni's house. The first time was right after

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Christmas of 2023 when Toni and Ryan went to South Carolina. The second time was when Toni gave birth to her newborn in March of 2023.

Tammy explained she observed how Kinsleigh's physical condition worsened over the course of the last 5 – 6 months. Tammy stated Kinsleigh was last completely normal around October of 2023. Tammy stated she thought about calling the police or getting Kinsleigh medical attention, but she never did because she did not want to risk Toni losing custody of her other children. Tammy stated she first discovered that Toni was putting Kinsleigh into the closet just before Christmas of 2023. Tammy explained Toni had first shown her Kinsleigh inside of the closet while they were on a video call. Tammy stated she first observed the closet in-person and what it had been used for just after Christmas of 2023. Tammy observed fecal matter on the wall inside of the closet at that time. Tammy stated she learned from Toni that Kinsleigh had escaped the closet, and Toni had put a gate inside of the closet to prevent Kinsleigh from getting to the door.

Tammy stated that by around mid-February of 2024, Toni mostly kept Kinsleigh in the closet except for when she left the house to go somewhere. Tammy stated that in mid-March of 2024, she had been at the house and observed that Kinsleigh was in the closet. Tammy explained it was around mid-afternoon, and she told Toni that it needed to stop. Tammy did not get Kinsleigh out of the closet at that time and knew that Toni was not going to let her out when she left the house. Tammy stated she knew Kinsleigh was in the closet most of the day by that time because Toni had told her that. Tammy recognized that it was wrong for Kinsleigh to be in the closet like that, but she did not do anything about it because she did not want Toni to lose custody of her other children. Tammy stated she should receive whatever punishment because she did not do anything to help Kinsleigh.

Additionally, Tammy explained that she had watched Kinsleigh a lot during the Summer of 2023. Tammy stated she used duct tape to try and keep Kinsleigh from getting up at night. Tammy stated she used the duct tape twice on Kinsleigh in the same night. Tammy explained how she put the duct tape on Kinsleigh to keep her from getting out. Tammy stated she first put the duct tape over her legs and taped it to the bed covers. Tammy stated Kinsleigh was able to get out of it, so she put more duct tape over the top of her shoulders, upper legs, and lower legs. Tammy stated she taped it to the bed covers again. Tammy stated that after 20 – 30 minutes, Kinsleigh was moving out of it, so she just ripped up the duct tape and gave up. Tammy stated that occurred at the house in Plainfield, IN.

On April 12th, 2024, Tammy was placed under arrest. PSO Copeland transported Tammy to the CJC. Tammy had been in-possession of a black Samsung cellular phone at the time of her arrest. The phone was seized as evidence. Detective Nichol森 transported the phone to the IMPD Property Room to be held as evidence.

On April 13th, 2024, Detective Nichol森 interviewed Tammy's co-worker, M.B. M.B. stated the following during the interview –

M.B. stated she worked as an employee under Tammy's supervision. M.B. stated Tammy had only been working with her since around December of 2023. M.B. could not recall when exactly, but she had overheard Tammy talking about how Kinsleigh was overly hyper and exhibiting ADHD-related behaviors. M.B. stated Tammy talked about how she would have to tie or hold Kinsleigh down to prevent her from getting into things at night. M.B. could not recall any further specifics about what Tammy had said.

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On April 13th, 2024, Detective Davis interviewed Toni's sister, L.M. L.M. stated the following during the interview –

L.M. stated she did not know about anything until her mother, Tammy, called and said Kinsleigh was dead and that Toni had been arrested. L.M. explained she had seen the fire truck and ambulance head come through the trailer park. L.M. lived in the same mobile home community. L.M. stated Toni had called her Tuesday afternoon and told her that DCS was coming out to the house. L.M. stated Toni asked her to take J.H. to which she agreed. L.M. stated she went picked J.H. up from school and called Toni, but Toni did not answer. L.M. stated that later that same day, she received a Facebook message from Ryan. L.M. stated Ryan assumed that she already knew what had happened, but she did not. L.M. stated she only knew what Tammy had told her that evening. L.M. stated she did not see Kinsleigh at the party on Sunday that was at her house. L.M. stated she did not see Toni or Kinsleigh at Tammy's house for the solar eclipse because she had left before Toni arrived. L.M. stated she did not see Kinsleigh at Easter, but she did see Tammy and J.B.

L.M. stated she last saw Kinsleigh on Christmas day of 2023 at her house, located at 6420 Seattle Avenue, Indianapolis, IN 46241. L.M. explained Kinsleigh was very quiet, but she had always been quiet. L.M. stated it did look like Kinsleigh needed more protein. L.M. stated Toni told her she was still trying to figure out Kinsleigh's diet because of the prior g-tube related issues. L.M. stated she gave Toni ham and turkey to give Kinsleigh because of the protein. L.M. stated she told Toni she needed to give Kinsleigh vitamins. L.M. stated Toni told her that she knew and was working on it. L.M. stated she always checked in with Toni about her children, and Toni told her everything was good. L.M. stated she never watched or took care of Kinsleigh. L.M. stated Toni never reached out to her for help or advice on how to take care of the children. L.M. stated she never agreed with Toni's parenting styles. L.M. stated she wished she had seen something because it was devastating what happened to Kinsleigh.

On April 13th, 2024, Detective Nichol森 interviewed Ryan's cousin / friend, "C.S.". stated the following during the interview –

C.S. stated he went by the name of "C.S.," even though it was not his middle name. C.S. stated Ryan was his cousin and close friend. C.S. stated that on Tuesday, April 9th, 2024, Toni called him and told him that she needed to talk with Ryan. C.S. stated he and Ryan then went to pick B.W. up from school, and they brought him back to their shop. C.S. stated he did not know why or what had happened. C.S. stated he worked with Ryan. C.S. stated he picked Ryan up for work and drove him home every day that they worked. C.S. stated he drove a white Chevrolet Malibu. C.S. stated that he would usually hangout with Ryan for an hour or so after work. C.S. stated he did that with Ryan probably every-other-day. C.S. stated he never saw Kinsleigh much, and Ryan and him did not talk about the children. C.S. stated he did stay the night a few times at the house when they first moved into the trailer home on Denver Drive. C.S. stated he knew that Kinsleigh was in the closet at that time, but he never asked why or anything like that. C.S. stated he never saw Ryan interact with Kinsleigh. C.S. stated he did know that Toni would go back into the boys' room and deal with Kinsleigh in there, but he did not know how those interactions went. Ryan did not know anything further that could assist detectives with the case.

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On April 13th, 2024, Detective Davis applied for and was granted a search warrant, reference cause # 49D21-2404-MC-010335, to seize / search the data on Toni, Ryan, and Tammy's cellular phones.

On April 13th, 2024, Detective Davis applied for and was granted a search warrant, reference cause # 49D19-2404-MC-010337, for 6519 Denver Drive to photograph / collect the children's gate.

On May 7th, 2024, Detective Nichol森 conducted a cell phone provider check of Ryan, Tammy, and Lani's phone numbers. All three phone numbers utilized T-Mobile as their service provider. These phone number had been provided by each of the individuals as their phone number. The IMPD Digital Forensics Unit (DFU) had forensically examined each of the phones. Ryan's phone number had been identified as (803) 582-8336. Tammy's phone number had been identified as (317) 654-4385. Lani's phone number had been identified as (317) 400-8444.

As search warrant was obtained to examine each of the collected cell phones for evidence. The IMPD Digital Forensics Unit (DFU) forensically examined each of the phones and was able to extract data from those phones. Ryan Smith's phone number had been identified as (803) 582-8336. Tammy Halsey's phone number had been identified as (317) 654-4385, and Lani McClure's phone number had been identified as (317) 400-8444. Toni McClure's phone was generally used as a no-service cell phone operating primarily through Wi-Fi.

Det. Nichol森 obtained Facebook records for the accounts of Chad Smith, Dakota Smith, Lani McClure, Michelle Smith, Ryan Smith, Tammy Halsey, and Toni McClure. Contained within those records are discussions concerning DCS visits, Kinsleigh's nutrition, physical appearance, general welfare, and treatment.

A review of Tammy Halsey's Facebook records reveals a Facebook Message thread between Tammy Halsey and her daughter Toni McClure. The messages establish a lengthy and regular pattern of Tammy Halsey assuming care of Kinsleigh Welty both at Tammy's Halsey's residence in Mooresville as well as at the Denver Drive address. The care and custody of Kinsleigh Welty would extend from several hours to several days at a time at which point Tammy Halsey would return Kinsleigh Welty to Toni and Ryan's custody. Toni McClure would use Facebook messenger to contact Tammy Halsey to watch Kinsleigh so Toni, Ryan, and the other children could attend events, run errands, or visit other family without taking Kinsleigh with them. The periods of time that Tammy Halsey assumed care of Kinsleigh lasted several years up to and including the time shortly before Kinsleigh's death.

Tammy Halsey's Facebook Messenger conversation with Toni McClure includes references to withholding food from Kinsleigh, controlling her intake of certain items, as well as Kinsleigh's desire to eat and drink items without permission.

There are also a number of discussions about locking the refrigerator, cabinets, and generally preventing access to food.

Throughout the thread, Tammy Halsey and Toni McClure refer to Kinsleigh by a number of names including but not limited to Evil, Demon, Dispsht, Dummy, Chunkers and Heiffer.

Messages are exchanged between Toni McClure and Tammy Halsey discussing the confinement and abuse of Kinsleigh.

On May 31, 2022, Toni messages Tammy: Kinsleigh was out of the fucking closet, sitting on bradlys old bed.

Tammy responds: Put something in front of it

Toni: I just asked Philley if he let her out and he said no, and I asked if shew as already out when he went up there and he said yeah. Bradley was assed out so I don't know, but she got into the sugar free wafers.

Tammy: Put something in front so she can't push the door.

Toni: I did.

Tammy: You're going to have to keep her home one weekend just to show her you mean business.

Toni: She hates being smacked on her belly just so you know.

Tammy: Oh I know.

On May 1, 2023, Toni messages Tammy a photo of Kinsleigh crouching down next to a couch.

Tammy responds: What the fuck is she doing?

Toni: Hiding drinking Philley's cup

Tammy: Tell her she's going tomorrow

Tammy: Did you not wrap her ass up?

Affidavit for Probable Cause

Toni: Yes I did.
Toni: She got out.
Tammy: Damn do it tighter

On July ,7 2023, Toni messages Tammy asking her to stay in a hotel room and watch the children. Tammy tells Toni she doesn't want to.
Tammy: It's the no sleep and have to work on Monday.
Toni: Do your duct tape thing. Sleep. I won't ask again.

On September 20, 2023, Toni messages Tammy: She figured it out.
Tammy: What
Toni: She has damn near got that door pushed open.
Tammy: Tape her ass down.

On October 6, 2023, Toni messages Tammy: She broke the lock on the door and the shit that was in her pants she shoved under the couch.
Tammy later responds: Tie her fucking ass up.

On October 9, 2023, Toni messages Tammy: So wanna keep Kinsleigh so we don't have to destroy and door for a new lock and I'll bring Philley in the morning?
Tammy: I was going to tell you I could take you but you said he wanted to go nope nope nope
Toni: Yeah.... Arrival time is 7
Toni: And he sees the eyes doctor at 12:30
Toni: Coooommmmmeeeee ooooooonnnn. Take one for the freaking team man. You do your method and it works. Can't do that here. (Laughing Face Emojis). I'll clean her up first. (Skull and Crossbones Emoji)

On October 16, 2023, Toni messages: She pissed on the floor. She has the closet smelling terrible. Got into Bradley's drink and spilled it everywhere.
Tammy: Son of a bitch. I don't understand.

Throughout the messages located on Tammy Halsey's Facebook thread with Toni McClure, there are repeated references to Kinsleigh's appearance and hiding Kinsleigh from both the public and DCS. During the last year of Kinsleigh's life she went from weighing approximately 35 pounds to 21 at the time of her death.

On January 2, 2024, Tammy asks Toni: Am I keeping them here or your house?
Toni: It doesn't matter, as long as you promise of them bitches show up that you make them leave and tell them they're not there. That's the only thing I worry about.

On March 22, 2024, Tammy messaged Toni: DCS showed up again.
Toni: Oh Jesus Christ
Toni: I guess we need to figure out a day where you can take Kinsleigh and I can deal with it, but I really just don't want to.

On April 9, 2024, Toni messaged Tammy: So I don't have much in my fridge or my cabinets but DCS is coming out today, as soon as I get Bradly so I don't know what to do with her. The bitch didn't even make sense. Call me on your lunch.

/s/

DATED: April 14, 2024

Affidavit for Probable Cause

All events occurred in Indianapolis, Marion County, Indiana.

DATED: 04/14/2024

/s/ Shane NicholSEN
AFFIANT

/s/

DATED: April 14, 2024