



**OFFICE OF THE PROSECUTING ATTORNEY
ERIC M. HOFFMAN, PROSECUTOR
46TH JUDICIAL CIRCUIT
DELAWARE COUNTY, INDIANA**

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FOR IMMEDIATE RELEASE

From: Eric M. Hoffman, Prosecuting Attorney
prosecutor@co.delaware.in.us
Date: August 4, 2022

PROSECUTOR CHARGES
FOUR PEOPLE IN CONNECTION WITH DALEVILLE MURDER

Muncie Indiana – On today's date the Prosecuting Attorney Eric M. Hoffman formally charged Alexander T. Geesy (DOB 10/24/2003) with the following criminal offenses:

- Count 1: Murder, a felony
- Count 2: Obstruction of Justice, a Level 6 Felony
- Felony Firearm Enhancement

Brandi L. Zirkle (DOB 11/13/1990) was formally charged with the following criminal offenses:

- Count 1: Assisting a Criminal, a Level 5 Felony
- Count 2: Obstruction of Justice, a Level 6 Felony
- Count 3: Neglect of a Dependent, a Level 6 Felony
- Count 4: Neglect of a Dependent, a Level 6 Felony
- Count 5: Neglect of a Dependent, a Level 6 Felony

Ryan J. Geesy (DOB 11/3/1999) was formally charged with the following criminal offenses:

- Count 1: Assisting a Criminal, a Level 5 Felony
- Count 2: Obstruction of Justice, a Level 6 Felony

Dawn S. Schattner (DOB 5/29/1969) was formally charged with the following criminal offenses:

- Count 1: Assisting a Criminal, a Level 5 Felony
- Count 2: Obstruction of Justice, a Level 6 Felony
- Count 3: Neglect of a Dependent, a Level 6 Felony

The charges are pending in the Delaware Circuit Court No. 5. The Honorable Judge Thomas A. Cannon Jr. will set the matter for an initial hearing. Copies of the charging information and Affidavit of Probable Cause that were filed with the Court are attached. The Court has ordered that Alexander Geesy be held in custody without bail.

Pursuant to Indiana law:

- Murder is punishable by 45 – 65 years in prison and up to a \$10,000 fine.
- Each Level 5 Felony is punishable by 1 – 6 years in prison and up to a \$10,000 fine.
- Each Level 6 Felony is punishable by 6 months – 2.5 years in prison and up to a \$10,000 fine.
- The Firearm Enhancement can add an additional 5 – 20 years to the total sentence

It is important to remember that any accusation that someone has committed a crime, an arrest and/or the filing of a criminal charge is simply an allegation and is not evidence of guilt. All suspects are presumed innocent unless and until proven guilty beyond a reasonable doubt at trial. The ethical rules for prosecutors in Indiana prohibit further comment on this matter. At this time, there will be no further comment.

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STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-MR

INFORMATION:

STATE OF INDIANA

VS

ALEXANDER T. GEESY

1709 N. Broadway
Anderson, IN 46016

DOB: 10/24/2003
SSN: xxx-xx-4809

Count 1:
Murder
I.C. 35-42-1-1(1)
a Felony

Count 1:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Alexander T. Geesy did knowingly kill another human being, to-wit: William Coomer contrary to the form of the statutes in such cases made and provided by I.C. 35-42-1-1(1) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-MR

INFORMATION:

STATE OF INDIANA

VS

ALEXANDER T. GEESY

1709 N. Broadway
Anderson, IN 46016

DOB: 10/24/2003
SSN: xxx-xx-4809

Count 2:
Obstruction of Justice
I.C. 35-44.1-2-2(a)(3)
a Level 6 Felony

Count 2:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Alexander T. Geesy did alter, damage or remove a record, document or thing with the intent to prevent said item from being produced or used as evidence in a legal proceeding or criminal investigation, contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-2(a)(3) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
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STATE OF INDIANA)
)
SS:
COUNTY OF)
DELAWARE)

IN THE DELAWARE CIRCUIT COURT 5
CAUSE NUMBER: 18C05-2208-MR

STATE OF INDIANA

VS

ALEXANDER T. GEESY

NOTICE OF INTENT TO SEEK ENHANCED PENALTY FOR FIREARM USE

The undersigned, says that on or about July 22, 2022, Alexander T. Geesy, did knowingly use a firearm during the commission of the offense of murder, all of which is contrary to the form of the statutes in such cases made and provided, to-wit: I.C. 35-50-2-11 and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /S/ Douglas Mawhorr
Douglas Mawhorr
Deputy Prosecuting Attorney

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

1850

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

COMES NOW: Matthew Kubiak, a police officer of the Delaware County Sheriff's Office, and being first duly sworn upon oath, deposes and says that the following described person was arrested, without Warrant upon the charge(s) and circumstances herein after stated, and makes this affidavit for the purpose of establishing probable cause for said arrest.

NAME OF ARRESTEE: Alexander Geesy D.O.B. 09/24/2003

ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1030 AM PM

CHARGES:	<u>Murder</u>	a class	<u> </u>	Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u>Obstruction of Justice</u>	a class	<u>6</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u> </u>	a class	<u> </u>	Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u> </u>	a class	<u> </u>	Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u> </u>	a class	<u> </u>	Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u> </u>	a class	<u> </u>	Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>

The basis and reasons why this officer believes that said arrestee committed the aforesaid offense(s) in Delaware County, State of Indiana, are as follows:

On July 22nd, 2022, at approximately 2:12 PM, Delaware County Dispatch was called by Stephanie Coomer stating that her husband, Randall Coomer, had been shot. Randall was pronounced deceased by emergency medical personnel at the scene located in the 12000 block of S CR 500 W, Daleville, Indiana.

Stephanie described to Investigators the incidents that took place prior to her making the 911 call. Stephanie states that she was parked getting her mail when two vehicles, one being a red Ford Focus, the other being a white Ford Explorer came racing down the road almost hitting her. Stephanie believes there were 3-4 people in the red Ford Focus and was unsure how many people were in the white Ford Explorer. The occupants of the Ford Focus yelled profanities and made obscene gestures towards her and continued down the road to Sharp Cemetary, located at 12101 S CR 500 W Rd, Daleville, Indiana. Stephanie observed the vehicles turn into Sharp Cemetary. She then pulled into her residence located just down the road located at 12220 S CR 500 W RD, Daleville, Indiana. While sitting in her car, she told her husband Randall what had just happened.

I affirm under penalty of perjury that the foregoing is true and accurate to the best of my information and belief.

DATE: 7/29/2022 Officer: *Matthew Kubiak* #1136

JUDICIAL DETERMINATION

The undersigned, being a judicial officer of Delaware County, and having reviewed the foregoing affidavit, now determines that probable cause existed for the arrest of said arrestee, and now fixes bail in the penal sum of \$ No bond

Dated: 7/30/22 Signed: *Sherry Howell* Title: Magistrate

PRE-INITIAL HEARING INFORMATION

Pre-initial Hearing Date: 8/3/22 Charges to be filed by Date: 8/8/22 Time: 1:00 PM

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
TERM

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NAME OF ARRESTEE: Alexander Geesy D.O.B. 09/24/2003

ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: _____ TIME OF ARREST: _____ AM PM

NARRATIVE CONTINUED:

On July 25, 2022, Dawn Schattner, the mother of Brandi Zirkle, stated that Brandi, Ryan, and Alexander have been driving the white Ford Explorer, which belongs to Dawn Schattner. Dawn also stated that all three have been riding in the red Ford Focus and it belongs to Alexander's sister, but she did not know her name. This was also verified by a witness, who had seen Brandi and Alexander in both the white Ford Explorer, and the red Ford Focus. The witness did not know the owner of either vehicle. Later, on July 25, 2022, Detectives were following up on leads for family of Alexander and Ryan, which took them to the address of 1709 Broadway St, Anderson Indiana. Upon arrival to the residence, the red Ford Focus was discovered in the back alley, backed in towards the house, and unoccupied. This car matched the information given in witness statements, and video evidence. On the undercarriage of the vehicle there was a cross member that had clumps of grass and soil stuck to it. The location of the soil/grass was consistent with the damage to the lane where the body of the victim was found. Hanging from the rearview mirror was a "Mr. Fog" lanyard, consistent with the same brand lanyard, found at the scene. A family member of Ryan and Alexander Geesy, stated that she let Alexander borrow her car at the beginning of July, since he did not have a car, and has had it since. On July 22nd, 2022, Alex returned the car to 1709 Broadway St. Alex called and told his mother, Karrie Geesy, at 3:15 PM, that he had returned the car. The family member was made aware of the car being returned the following day, on July 23rd, 2022, at around 10:35 PM. A family member also stated that she bought Alexander a firearm a few days prior to the shooting, pawning his gun and buying him another. A copy of the pawn ticket was recovered at Allen's Pawn Shop, 130 E 10th St, Anderson Indiana. A family member purchased a Hi-Point .40 caliber handgun Serial #X7299738, the same caliber as the spent shell casing recovered at the crime scene.

Video of the "Get Go" gas station at 53rd/MLK in Anderson was later recovered for the date of July 22nd, 2022, the day of the shooting. At around 1:22 PM-1:34 PM both the red Ford Focus, and the white Ford Explorer are parked at the gas pumps. On camera Alexander Geesy can be seen exiting the driver's seat of the Ford Focus, and walking into the store. Alexander can also be seen carrying a handgun on his hip, in a holster, at the 2 o'clock position. Alexander walks out and then eventually gets into the drivers seat of the Ford Focus, followed by Brandi Zirkle getting into the front passenger, and eventually Ryan Geesy getting into the rear driver's side passenger door, followed by an unidentified female, in the rear passenger seat. The vehicles exit at around 1:34 PM with the white Ford Explorer, occupied with two persons, following the Ford Focus, heading towards Muncie.

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
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ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1030 AM PM

NARRATIVE CONTINUED:

On July 28th, 2022, Detectives identified one of the occupants in the red Ford Focus, prior to the shooting at the "Get Go" gas station on 7/22/2022. That witness will be identified as Witness 1 through this document due to the fact that they are under the age of 18. Witness 2 and 3 will be identified as such for the same reasons.

Witness 1 stated that on July 22nd, 2022, Brandi Zirkle, Ryan Geesy, Alexander Geesy, Dawn Schattner, a person who will be identified as Witness 2, and a person who will be identified as Witness 3, went to Sharp Cemetery. Witness 2, and Dawn drove in a separate vehicle from everyone else, a white Ford. While en route to Sharp Cemetery Witness 1 says that there was car parked on the wrong side of the road and they had words with other passengers in the car she was riding in. Witness 1 also states that they were flipping other cars off on their way to the cemetery. Witness 1 then states that the red car she was in backed in to the cemetery lane, followed by the white car. Ryan, Alexander, and Witness 1 exited the red car. A truck then pulled up and the victim, Randall Coomer (unidentified by Witness 1 by name), got into an argument with Ryan. Witness 1 says that Ryan eventually was struck by Randall, and Alexander drew his handgun, pointing it at Randall. Witness 1 says that Alexander told Randall to get on the ground multiple times, and at one point fired a warning shot at Randall. Randall was retreating back to his car when Alexander fired a shot at Randall, and Randall ran in the opposite direction. Randall would then run in the opposite direction of his truck, while Alexander fired more rounds. At one point, Witness 1 describes Randall falling into a ditch, and then being told to get back into the car. Witness one says that Alexander fired approximately 3-4 shots at Randall. After the shooting, Witness 1 says that Ryan flipped off the woman who was originally parked on the opposite side of the road, who would turn out to be the victim's wife. Witness 1 says that after driving off Alexander was frantic saying that he was going to go to prison and he was only 18, while Ryan was under stress because he stated that he had warrants. Witness 1 says that she was dropped off with Dawn, while Brandi, Ryan, and Alexander left; Witness 1 believes they went to Tennessee. Witness 1 was also instructed not to talk about the events that occurred.

Witness 2 stated that on July 22nd, 2022, Alexander Geesy, Ryan Geesy, Brandi Zirkle, Dawn Schattner, and Witnesses 1,2 and 3, were going to Sharps Cemetery to celebrate a birthday. Witness 2 and Dawn were in a white Ford Explorer, while Alexander, Ryan, Brandi and Witnesses 1/3 were in the red car. While on the way to the cemetery, the persons in the red car were flipping off people they were passing. Witness 2 states that once they got in the area of the cemetery there was a car parked on the wrong side of the road so they had to go around it, but the people in the red car flipped that car off. Once at the cemetery the red car backed down the lane first, and then the white Ford.

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

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ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1030 AM PM

NARRATIVE CONTINUED:

A short time later Randall Coomer driving his truck pulled up (Witness 2 did not identify victim by name). Witness 2 says that Randall got out of his truck and started saying that they had flipped off his wife. Ryan got out to calm down Randall, and they got into an argument. Randall eventually struck Ryan, which made Alexander draw his firearm, and pointed it at Randall. Alexander gave Randall 3 commands to get on the ground to which he gave a warning shot to Randall. Randall was retreating to his truck when Alexander fired another shot, causing Randall to run in the opposite direction. Alexander fired more shots while Randall was running in the opposite direction of his truck, causing him to fall into a ditch. Witness 2 says that Alexander fired approximately 3-4 shots, out of a black handgun, which he had just recently acquired. Witness two says that they then left the scene in the separate vehicles they arrived in, and Dawn said that everything was going to be fine. Brandi, Alexander, and Ryan then dropped off Witness 1/3 off to Dawn with Witness 2, and they left. Witness 2 believes they may have gone to Tennessee.

Dawn Schattner also later came forward and gave the following statement on her account of the events that took place on July 22nd, 2022. Dawn requested that a nurse and Chaplin be with her as she gave a statement. Dawn was also read a rights waiver form to which she consented to give a statement. Dawn apologized for lying in previous interviews, saying that she just wanted to protect everyone. Dawn said that "they all wanted to go look at gravestones" and were going to a cemetery near Daleville. Dawn said that Alexander, Ryan, Brandi, Witness 1/3 were all in the red car, while she and Witness 2 were in the white car. Dawn said that Alexander was driving, and they started flipping off everyone who didn't wave back while they were driving. Dawn said that upon arrival to the cemetery Alexander backed down the lane first, and then Dawn backed in. Dawn said that they had flipped off a woman because she was driving on the wrong side of the road. Dawn said that the female must have went and told her husband because a black truck pulled up and a male got out of it yelling and screaming about someone flipping off his wife. Dawn said that the man (unknown by the victim to be named Randall Coomer), was getting verbally violent. Ryan walked up to Randall asking what his problem was and that she should have waived back and not been driving on the wrong side of the road. Dawn stated Ryan began to walk away when the victim stated "mother fucker I'm crazy and I get a check for that shit, don't fuck with me." Dawn stated the conversation kept getting more and more intense between Ryan and the victim. Dawn stated she saw the victim punch Ryan in the face. Dawn stated she looked over and witnessed Alex pull his gun out and point it at the victim. Dawn stated she heard Alex tell the victim to "get on the ground". Dawn stated the victim laughed at him and Alex replied "no I'm serious get on the ground ass hole". Dawn stated the victim did not respond to Alex. Dawn stated Alex then told the victim twice more to "get on the ground" and then Alex shot his gun. Dawn stated after the first shot the victim did not respond once again so Alex fired another shot. Alex stated "I'm serious". As the victim turned to go to his truck Alex fired once again. Dawn stated that this time the victim ran in the opposite direction of his truck. Dawn stated that while the victim was running Alex fired two more times. Dawn then said that the victim went down into the ditch, and the family left south in their cars.

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

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NAME OF ARRESTEE: Alexander Geesy D.O.B. 09/24/2003

ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1030 AM PM

NARRATIVE CONTINUED:

On July 29th, 2022, Alexander, Brandi, and Ryan were arrested at 3100 S Tillotson Ave, Muncie Indiana.

Brandi Zirkle was read a rights waiver form to which she consented to an interview. Brandi said that they came back from Tennessee and that they came up with this elaborate story, for Ryan to take the fall for Alex since he was only 18. Brandi said that Ryan was the one who shot the victim (not identified as Randall by Brandi). Brandi also later stated that she wanted to try to cover for Alexander because she loved him so much. Brandi corrected her story and said that she was going to tell the truth, and that the truth was that Alexander was the one who shot Randall. Brandi said that on July 22nd, 2022 Dawn, Witnesses 1,2, and 3, Ryan, Alexander, and herself went to Sharp Cemetery. On the way to Sharps Cemetery they came across a car that was parked on the wrong side of the road, so they went around it. They backed in their cars to the cemetery, the red one backing down first, followed by the white one. Ryan got out of the car first to help back in Dawn, in the white car. A black truck pulled up shortly after and a man got out shouting. Ryan went up to him and the two men got into a verbal altercation. At one point the verbal altercation turned physical, and Ryan got knocked to the ground. Alexander saw his brother get knocked down and drew his weapon, which Brandi said was a .40 cal. Alexander gave Randall directions to get on the ground, to which Randall refused. Alexander said that he then fired a warning shot to the left. Randall started running away from his truck and Alex fired more rounds in the direction of Randall. Brandi said that the victim fell in the ditch, and they all drove off. Brandi said that they later went to Tennessee to try to hide. Brandi also said that she signed over her 3 children that were with her at the time of the shooting to her mother Dawn, so that they could be safe, and it wasn't safe to be with her. Brandi also acquired a bill of sale for the vehicle from Dawn for the white SUV they used to flee to Tennessee, the same white car present at the shooting of Randall.

Ryan Geesy was read a rights waiver form to which he consented to an interview. Ryan stated the same story which had been told previously be Brandi, which had included him taking the fall for the shooting of Randall. However, Ryan was told to tell the truth to which he stated that his brother, Alex, was the one who shot Randall. Ryan said that on July 22nd, 2022, Dawn, Alex, Brandi, witness 1,2, and 3, and himself went to Sharp Cemetery. On the way to the Cemetery they passed a car that was on the wrong side of the road without their hazards on. Ryan said that when they got to the cemetery the red car that they were in which was a Ford Focus, driven by Alex, backed in first. Ryan was in the rear passenger seat of that vehicle, Brandi was in the passenger seat, Witness 1/3 were also in the vehicle. Witness 1/3 are juveniles. Dawn and witness 2 (another juvenile) were in the white car. Ryan exited the red car and helped Dawn back in the white car.

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

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NAME OF ARRESTEE: Alexander Geesy D.O.B. 09/24/2003

ADDRESS OF ARRESTEE: 1709 Broadway St, Anderson Indiana

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1030 AM PM

NARRATIVE CONTINUED:

Ryan said that a man driving a truck came up and approached them (Randall). Randall and Ryan got into a verbal altercation which turned physical. Ryan said that he was on the ground, and observed Alex pull his gun, and fire a warning shot to the left of Randall. Ryan said that Alex told Randall 3 times to get on the ground. Randall refused and eventually began walking back towards his truck. Alex fired rounds at Randall, at which time Randall took off running South, away from his truck. Ryan said that Alex fired 4 rounds total, and Randall was in the ditch. Ryan then stated that they all got into their vehicles and left, not offering any aide to Randall, or calling 911. Ryan said that they later fled to Tennessee.

Alexander Geesy was read a rights waiver form to which he consented to an interview. Alexander told the same elaborate story as Brandi and Ryan did before, about Ryan taking the fall for Alex. Alex, like Brandi, and Ryan, was told to tell the truth to which he corrected his statement as such. Alexander said that Dawn, Ryan, Brandi, Witness 1, 2 and 3, and he all went to Sharp Cemetery. Alexander was driving a red Ford Focus, Brandi, Ryan, and Witness 1 and 3 were in the red car, while Dawn and Witness 2 were in the white car. Alexander stated that on the way to the cemetery a car was parked on the wrong side of the road so they went around it. When they got to the cemetery Alex backed in the red car first, followed by the white SUV. Ryan got out of the red car to help back in the white SUV. After which, a truck pulled up and Randall (not identified by Alex) started arguing with Ryan about someone flipping off his wife. Alex said that a physical altercation occurred between Randall and Ryan, so he pulled his gun out and fired a warning shot to the left of Randall and ordered him to the ground. Randall refused to do so. Randall began walking back to his truck, Alex fired his gun again, and Randall began running to the south. Alex said that he then shot to the right of Randall as he was running to the South, away from his truck. Alex said that the man was in the ditch, and everyone got into the vehicles and drove away, not offering any aide to Randall. Alex said that Ryan, Brandi, and he, fled to Tennessee because they were scared.

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

BRANDI L. ZIRKLE

933 Washington Blvd.
Anderson, IN 46016

DOB: 1/13/1990

SSN: xxx-xx-4674

Count 1:

Assisting a Criminal
I.C. 35-44.1-2-5(a)(2)
a Level 5 Felony

Count 1:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Brandi L. Zirkle did harbor, conceal and/or assist, Alexander T. Geesy, a person who has committed a crime, to-wit: Murder, a felony, or is a fugitive from justice, with the intent to hinder the apprehension or punishment of the said Alexander T. Geesy, Brandi L. Zirkle not standing in the relationship of parent, child or spouse to Alexander T. Geesy, harbored, concealed or otherwise assisted Alexander T. Geesy, contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-5(a)(2) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

BRANDI L. ZIRKLE

933 Washington Blvd.
Anderson, IN 46016

DOB: 1/13/1990

SSN: xxx-xx-4674

Count 2:

Obstruction of Justice
I.C. 35-44.1-2-2(a)(3)
a Level 6 Felony

Count 2:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Brandi L. Zirkle did alter, damage or remove a record, document or thing with the intent to prevent said item from being produced or used as evidence in a legal proceeding or criminal investigation contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-2(a)(3) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
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46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
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STATE OF INDIANA)
) SS:
COUNTY OF DELAWARE)

IN THE DELAWARE CIRCUIT COURT 5
CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

BRANDI L. ZIRKLE

933 Washington Blvd.
Anderson, IN 46016

DOB: 1/13/1990

SSN: xxx-xx-4674

Count 3:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count 3:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Brandi L. Zirkle having the care of Brandon Naylor, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

BRANDI L. ZIRKLE

933 Washington Blvd.
Anderson, IN 46016

DOB: 1/13/1990

SSN: xxx-xx-4674

Count 4:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count 4:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Brandi L. Zirkle having the care of Destany Gregory, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
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INFORMATION:

STATE OF INDIANA

VS

BRANDI L. ZIRKLE

933 Washington Blvd.
Anderson, IN 46016

DOB: 1/13/1990

SSN: xxx-xx-4674

Count 5:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count 5:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Brandi L. Zirkle having the care of Jonathan Anderson, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

1849

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

COMES NOW: Matthew Kubiak, a police officer of the Delaware County Sheriff's Office, and being first duly sworn upon oath, deposes and says that the following described person was arrested, without Warrant upon the charge(s) and circumstances herein after stated, and makes this affidavit for the purpose of establishing probable cause for said arrest.

NAME OF ARRESTEE: Brandi Zirkle D.O.B. 01/13/1990

ADDRESS OF ARRESTEE: 933 Washington Blvd, Anderson

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1000 AM PM

CHARGES:	<u>Obstruction of Justice</u>	a class	<u>5</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u>Assisting a Criminal</u>	a class	<u>5</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u>Neglect of a Dependent x 3</u>	a class	<u>6</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>

The basis and reasons why this officer believes that said arrestee committed the aforesaid offense(s) in Delaware County, State of Indiana, are as follows:

On July 22nd, 2022, at approximately 2:12 PM, Delaware County Dispatch was called by Stephanie Coomer stating that her husband, Randall Coomer, had been shot. Randall was pronounced deceased by emergency medical personnel at the scene located in the 12000 block of S CR 500 W, Daleville, Indiana.

Stephanie described to Investigators the incidents that took place prior to her making the 911 call. Stephanie states that she was parked getting her mail when two vehicles, one being a red Ford Focus, the other being a white Ford Explorer came racing down the road almost hitting her. Stephanie believes there were 3-4 people in the red Ford Focus and was unsure how many people were in the white Ford Explorer. The occupants of the Ford Focus yelled profanities and made obscene gestures towards her and continued down the road to Sharp Cemetery, located at 12101 S CR 500 W Rd, Daleville, Indiana. Stephanie observed the vehicles turn into Sharp Cemetery. She then pulled into her residence located just down the road located at 12220 S CR 500 W RD, Daleville, Indiana. While sitting in her car, she told her husband Randall what had just happened.

I affirm under penalty of perjury that the foregoing is true and accurate to the best of my information and belief.

DATE: 7/29/2022 Officer: [Signature]

JUDICIAL DETERMINATION

The undersigned, being a judicial officer of Delaware County, and having reviewed the foregoing affidavit, now determines that probable cause existed for the arrest of said arrestee, and now fixes bail in the penal sum of \$ \$25,000 cash or surety in defendant's name

Dated: 7/30/22 Signed: [Signature] Title: Magistrate

PRE-INITIAL HEARING INFORMATION

Pre-initial Hearing Date: 8/3/22 Charges to be filed by Date: 8/8/22 Time: 1:00 pm

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

COMES NOW: Matthew Kubiak, a police officer of the Delaware County Sheriff's Office, and being first duly sworn upon oath, deposes and says that the following described person was arrested, without Warrant upon the charge(s) and circumstances herein after stated, and makes this affidavit for the purpose of establishing probable cause for said arrest.

NAME OF ARRESTEE: Brandi Zirkle D.O.B. 01/13/1990

ADDRESS OF ARRESTEE: 933 Washington Blvd, Anderson

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1000 AM PM

NARRATIVE CONTINUED:

Randall then stated that he was going to go tell them to slow down. While Stephanie was talking to Randall about the vehicles, another witness passed the Sharp Cemetery and observed the red Ford Focus and the white Ford Explorer and saw two people get out of the white Ford Explorer and 3 more people sitting in the Ford Explorer. The red Ford Focus and the white Ford Explorer were parked at the cemetery entrance on the Northwest side of the road. Randall left the residence, leaving Stephanie Coomer behind Randall pulled his car up to the area where the cars were.

At around 2:02 PM Stephanie called Randall because she was worried. She and Randall talked and confirmed the vehicles as a white Ford Explorer and a red Ford Focus. During their conversation, Stephanie heard a metal clanging sound, what she believes was a gunshot(s). She immediately drove back down her driveway and observed the two vehicles she had previously seen "peel" out of the cemetery and take off South on CR 500 W. When the vehicles drove by Stephanie, they again yelled profanities and made obscene gestures at her. Stephanie went to look for Randall, where she found him South of the lane on the West side of the road. A bystander stopped to move Randall's truck, as it was parked in the middle of CR 500 W, so that EMS personnel could assist Randall. When EMS arrived, they pronounced Randall deceased. An autopsy would later show that Randall suffered a gunshot wound through is lower right back, which went through his body, penetrating his aortic artery, and through his heart and exiting his body, this was a fatal wound. Witnesses at the scene describe a red Ford Focus and a white Ford Explorer with Tennessee license plates leaving the scene going south. Video of the two vehicles traveling together prior to the fatal shooting, is also available, as well as video of the two vehicles leaving the scene together. At the crime scene, in the lane leading to the road, dirt had been freshly disturbed by the tires and underbody of the vehicle, due to the steep incline of the lane to the road. On the road, there was also dirt which had been carried by the undercarriage of the vehicle. A "Mr. Fog lanyard" containing two keys, was also found at the scene. A spent .40 caliber shell casing was also located at the scene of the shooting.

On July 29th, 2022 Brandi was read a rights waiver form to which she consented to give a statement. Brandi said that all three of her juvenile children were present at the scene of the shooting which occurred on July 22nd, 2022. Brandi brought her children to the cemetery and then said after the fact that she signed her legal rights over to her mother Dawn, because she thought they would be safer with Dawn, "because clearly they weren't with me "(Brandi). Brandi also stated that she acquired a bill of sale for the white Ford Explorer from Dawn which allowed Alex, Brandi, and Ryan to flee to Tennessee. In Tennessee Alex, Brandi, and Ryan stayed on the property of Brandi's mother, Dawn. This all happened the day after the shooting on July 23rd, 2022. Brandi also admitted to being part of an elaborate scheme to tell a story in which Ryan would take the fall, which she told to investigators initially, but later would tell the truth and say that Alexander Geesy was the one who fatally shot Randall Coomer.

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

Count 1:
Assisting a Criminal
I.C. 35-44.1-2-5(a)(2)
a Level 5 Felony

VS

RYAN J. GEESY

625 Main St.
Anderson, IN 46012

DOB: 11/3/1999
SSN: xxx-xx-4512

Count 1:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Ryan J. Geesy did harbor, conceal, and/or assist, Alexander T. Geesy, a person who has committed a crime, to-wit: Murder, a felony, or is a fugitive from justice, with the intent to hinder the apprehension or punishment of the said Alexander T. Geesy, Ryan J. Geesy not standing in the relationship of parent, child or spouse to Alexander T. Geesy, harbored, concealed or otherwise assisted Alexander T. Geesy, contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-5(a)(2) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

RYAN J. GEESY

625 Main St.
Anderson, IN 46012

DOB: 11/3/1999

SSN: xxx-xx-4512

Count 2:
Obstruction of Justice
I.C. 35-44.1-2-2(a)(3)
a Level 6 Felony

Count 2:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Ryan J. Geesy did alter, damage or remove a record, document or thing with the intent to prevent said item from being produced or used as evidence in a legal proceeding or criminal investigation, contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-2(a)(3) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

1848

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

COMES NOW: Matthew Kubiak, a police officer of the Delaware County Sheriff's Office, and being first duly sworn upon oath, deposes and says that the following described person was arrested, without Warrant upon the charge(s) and circumstances herein after stated, and makes this affidavit for the purpose of establishing probable cause for said arrest.

NAME OF ARRESTEE: Ryan Geesy D.O.B. 11/03/1999

ADDRESS OF ARRESTEE: homeless

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1015 AM PM

CHARGES:	<u>Obstruction of Justive</u>	a class	<u>5</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
	<u>Assisting a Criminal</u>	a class	<u>5</u>	Felony	<input checked="" type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>
		a class		Felony	<input type="checkbox"/>	Misdemeanor	<input type="checkbox"/>

The basis and reasons why this officer believes that said arrestee committed the aforesaid offense(s) in Delaware County, State of Indiana, are as follows:

On July 22nd, 2022, at approximately 2:12 PM, Delaware County Dispatch was called by Stephanie Coomer stating that her husband, Randall Coomer, had been shot. Randall was pronounced deceased by emergency medical personnel at the scene located in the 12000 block of S CR 500 W, Daleville, Indiana.

Stephanie described to Investigators the incidents that took place prior to her making the 911 call. Stephanie states that she was parked getting her mail when two vehicles, one being a red Ford Focus, the other being a white Ford Explorer came racing down the road almost hitting her. Stephanie believes there were 3-4 people in the red Ford Focus and was unsure how many people were in the white Ford Explorer. The occupants of the Ford Focus yelled profanities and made obscene gestures towards her and continued down the road to Sharp Cemetary, located at 12101 S CR 500 W Rd, Daleville, Indiana. Stephanie observed the vehicles turn into Sharp Cemetary. She then pulled into her residence located just down the road located at 12220 S CR 500 W RD, Daleville, Indiana. While sitting in her car, she told her husband Randall what had just happened.

I affirm under penalty of perjury that the foregoing is true and accurate to the best of my information and belief.

DATE: 7/29/2022 Officer: [Signature] #134

JUDICIAL DETERMINATION

The undersigned, being a judicial officer of Delaware County, and having reviewed the foregoing affidavit, now determines that probable cause existed for the arrest of said arrestee, and now fixes bail in the penal sum of \$ \$10,000 cash, surety or 10% cash in defendant's name 102 \$20,000

Dated: 7/30/22 Signed: [Signature] Title: Magistrate

PRE-INITIAL HEARING INFORMATION

Pre-initial Hearing Date: 8/3/22 Charges to be filed by Date: 8/8/22 Time: 1:00 PM

STATE OF INDIANA)
DELAWARE COUNTY)

IN THE DELAWARE COUNTY COURT SYSTEM
2022 TERM

AFFIDAVIT OF PROBABLE CAUSE FOR ARREST WITHOUT WARRANT

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NAME OF ARRESTEE: Ryan Geesy D.O.B. 11/03/1999

ADDRESS OF ARRESTEE: homeless

DATE OF ARREST: 07/29/2022 TIME OF ARREST: 1015 AM PM

NARRATIVE CONTINUED:

Randall then stated that he was going to go tell them to slow down. While Stephanie was talking to Randall about the vehicles, another witness passed the Sharp Cemetery and observed the red Ford Focus and the white Ford Explorer and saw two people get out of the white Ford Explorer and 3 more people sitting in the Ford Explorer. The red Ford Focus and the white Ford Explorer were parked at the cemetery entrance on the Northwest side of the road. Randall left the residence, leaving Stephanie Coomer behind Randall pulled his car up to the area where the cars were.

At around 2:02 PM Stephanie called Randall because she was worried. She and Randall talked and confirmed the vehicles as a white Ford Explorer and a red Ford Focus. During their conversation, Stephanie heard a metal clanging sound, what she believes was a gunshot(s). She immediately drove back down her driveway and observed the two vehicles she had previously seen "peel" out of the cemetery and take off South on CR 500 W. When the vehicles drove by Stephanie, they again yelled profanities and made obscene gestures at her. Stephanie went to look for Randall, where she found him South of the lane on the West side of the road in a ditch. A bystander stopped to move Randall's truck, as it was parked in the middle of CR 500 W, so that EMS personnel could assist Randall. When EMS arrived, they pronounced Randall deceased. An autopsy would later show that Randall suffered a gunshot wound through is lower right back, which went through his body, penetrating his aortic artery, and through his heart and exiting his body, this was a fatal wound. Witnesses at the scene describe a red Ford Focus and a white Ford Explorer with Tennessee license plates leaving the scene going south. Video of the two vehicles traveling together prior to the fatal shooting, is also available, as well as video of the two vehicles leaving the scene together. At the crime scene, in the lane leading to the road, dirt had been freshly disturbed by the tires and underbody of the vehicle, due to the steep incline of the lane to the road. On the road, there was also dirt which had been carried by the undercarriage of the vehicle. A "Mr. Fog lanyard" containing two keys, was also found at the scene. A spent .40 caliber shell casing was also located at the scene of the shooting.

Detectives later learned the identities of the persons involved in the shooting being Ryan Geesy, Brandi Zirkle, Dawn Schattner, Alexander Geesy, as well as 3 juveniles. It was also later learned through interviews with witnesses, that Alexander was the one who shot Randall Coomer, and that Ryan, Brandi, and Alexander had fled to Tennessee.

Ryan called Detective Branson on 7/29/2022 saying that he had Alex and Brandi "hostage" and was bringing them back to Muncie.

Ryan was read a rights waiver form to which he stated he would give a statement. Ryan admitted to getting rid of the red car driven by Alex on the day of the shooting, coming up with an elaborate story in which he would take the fall for the Murder Charge for Alex, and assisting Alex get to Tennessee. Ryan later told the truth, that it was in fact Alexander who shot Randall Coomer on July 22nd, 2022.

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

DAWN S. SCHATTNER

4925 Picea Blvd.
Anderson, IN 46016

DOB: 5/29/1969
SSN: xxx-xx-3844

Count 1:
Assisting a Criminal
I.C. 35-44.1-2-5(a)(2)
a Level 5 Felony

Count 1:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Dawn S. Schattner did harbor, conceal and/or assist, Alexander T. Geesy, a person who has committed a crime, to-wit: Murder, a felony, or is a fugitive from justice, with the intent to hinder the apprehension or punishment of the said Alexander T. Geesy, Dawn S. Schattner not standing in the relationship of parent, child or spouse to Alexander T. Geesy, harbored, concealed or otherwise assisted Alexander T. Geesy, contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-5(a)(2) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

DAWN S. SCHATTNER

4925 Picea Blvd.
Anderson, IN 46016

DOB: 5/29/1969
SSN: xxx-xx-3844

Count 2:
Obstruction of Justice
I.C. 35-44.1-2-2(a)(3)
a Level 6 Felony

Count 2:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Dawn S. Schattner did alter, damage or remove a record, document or thing, with the intent to prevent said item from being produced or used as evidence in a legal proceeding or criminal investigation contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-2-2(a)(3) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA) IN THE DELAWARE CIRCUIT COURT 5
) SS:
COUNTY OF DELAWARE) CAUSE NUMBER. 18C05-2208-F5

INFORMATION:

STATE OF INDIANA

VS

DAWN S. SCHATTNER

4925 Picea Blvd.
Anderson, IN 46016

DOB: 5/29/1969
SSN: xxx-xx-3844

Count 3:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count 3:

The undersigned says that on or about July 22, 2022 in Delaware County, State of Indiana, Dawn S. Schattner having the care of Brandon Naylor, a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

ERIC M. HOFFMAN
Prosecuting Attorney
46th Judicial Circuit of Indiana

BY: /s/ Douglas Mawhorr
Douglas Mawhorr 20481-49
Deputy Prosecuting Attorney
46th Judicial Circuit of Indiana

STATE OF INDIANA)
) SS:
COUNTY OF DELAWARE)

IN THE DELAWARE CIRCUIT COURT 5

CAUSE NUMBER. 18C05-2208-F5

STATE OF INDIANA

AFFIDAVIT FOR PROBABLE CAUSE

VS

Count 1:

DAWN S. SCHATTNER

Assisting a Criminal

I.C. 35-44.1-2-5(a)(2)

a Level 5 Felony

Count 2:

Obstruction of Justice

I.C. 35-44.1-2-2(a)(3)

a Level 6 Felony

Count 3:

Neglect of a Dependent

I.C. 35-46-1-4(a)(1)

a Level 6 Felony

The undersigned deposes and says upon information and belief that Dawn S. Schattner has committed the offense of Assisting a Criminal, a Level 5 Felony;Count 2: Obstruction of Justice, a Level 6 Felony;Count 3: Neglect of a Dependent, a Level 6 Felony, and in support thereof says as follows:

1. That this affiant is an investigator for the Delaware County Prosecutor's Office.
2. That the affiant has a written report from Detectives Matthew Kubiak and John T. Parks, people the affiant know to be deputies with the Delaware County Sheriff's Office and reliable people.
3. That this affiant is advised by this report that on July 22, 2022 Delaware County Dispatch was called by Stephanie Coomer ("Stephanie") stating that her husband William Coomer ("Coomer") had been shot.
4. William Coomer was pronounced deceased by emergency medical personnel at the scene located in the 12000 block of @. C.R. 500 W., Daleville, Indiana.
5. At the scene Stephanie advised she was parked at her mailbox when two vehicles, one being a red Ford Focus, the other being a white Ford Explorer, came racing down the road almost hitting her.

The occupants of the Ford Focus yelled profanities and made obscene gestures towards her and continued down the road to Sharp Cemetery, located at 12101 S. C.R. 500 W. Rd., Daleville, Indiana.

6. Stephanie observed the vehicles turn into Sharp Cemetery.
7. Stephanie then pulled into her residence located just down the road located at 12220 S. C.R. 500 W. Rd., Daleville, Indiana, where she informed her husband, Coomer, of the incident that just occurred.
8. Coomer advised he was going to go tell them to slow down. He then drove his vehicle to Sharp Cemetery and exited the vehicle.
9. After Coomer arrived at Sharp Cemetery Stephanie called him. Coomer confirmed to Stephanie the vehicles were a white Ford Explorer and a red Ford Focus.
10. During this conversation Stephanie heard a metal clanging sound that she believed to be a gunshot.
11. Stephanie immediately drove to Sharp cemetery where she observed the white Ford Explorer and red Ford Focus leaving the cemetery at a high rate of speed.
12. Upon searching Sharp Cemetery Stephanie found Coomer laying in a ditch suffering from a gunshot wound.
13. On July 25, 2022 Detective Parks and Detective John Branson interviewed Dawn Schattner ("Schattner") who advised she was the mother of Brandi Zirkle ("Zirkle") and the last time she saw Zirkle was July 23, 2022 . Alex Geesy ("Alex") and Ryan Geesy ("Ryan") were with Zirkle at that time.
14. When asked by Detective Branson if she knew why they were looking for Zirkle, Schattner claimed she did not know.
15. Schattner claimed she did not know what vehicle the three were traveling in on July 23, 2022.
16. Schattner advised that she had an '04 Ford Explorer. When asked where the Explorer was Schattner claimed "probably down home".
17. Schattner admitted that Zirkle, Alex and Ryan drive a red Ford Focus but she did not know who owned the vehicle.
18. On July 28, 2022 Detective Parks spoke with Schattner again while she was a patient at Community Hospital in Anderson, Indiana. Upon questioning, Schattner stated she did not know where her Ford Explorer was located. She advised Zirkle had a family emergency and she had allowed Zirkle to borrow the vehicle. Further into the conversation, Schattner told Detective Parks that she had given Zirkle a bill of sale for the Explorer showing Zirkle had bought the Explorer for \$500.00.
19. Schattner continued to claim she did not know what had happened or why police would want to speak to Zirkle but that she had told Zirkle to do the right thing.
20. Later on July 28, 2022 Detective Parks was contacted by a lieutenant from the Community Hospital Police Department who advised that Schattner had requested to speak with Detective Parks because she had witnessed a homicide.
21. Detective Parks returned to Community Hospital and spoke with Schattner again.
22. Schattner began by apologizing to Detective Parks for lying to him. She stated she was just trying to protect her kids.
23. Schattner proceeded to tell Detective Parks that on July 22, 2022 Schattner, Zirkle, Alex, Ryan and Zirkle's three minor children, B.N. age 16. D.G. age 14, and J.A. age 8, traveled to Sharp Cemetery to look at gravestones.
24. Schattner advised that she was driving the white Ford Explorer with B.N. in the passenger seat.

Zirkle, Alex , Ryan, D.G. and J.A. were in the red Ford Focus and Alex Geesy was driving.

25. Schattner stated that while enroute the occupants of the Ford Focus were making obscene gestures at other vehicles.
26. Upon arriving at Sharp Cemetery but before she had exited the Ford Explorer, Coomer arrived and engaged with Ryan.
27. Schattner went on to say that at some point in the confrontation Alex pulled a gun out and aimed it at Coomer. Alex then fired the gun five times.
28. Schattner witnessed Coomer fall into the ditch. She then fled the scene with B.N. in the passenger seat.
29. That on July 23, 2022 Schattner assisted Alex by giving Zirkle the Ford Explorer so that Alex and Zirkle could flee the State of Indiana.

I affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

Date: 8/4/22

/S/ Gala-Kay Laughner