

FILED

JUN 28 2021

Sabatha Eber
Clerk Jefferson Superior Circuit Court

IN THE CIRCUIT COURT
COUNTY OF JEFFERSON
STATE OF INDIANA

STATE OF INDIANA

CAUSE NO.: 39C01-2106-MR- *654*

VS.

AFFIDAVIT FOR PROBABLE CAUSE

MICHAEL J. KARNUTH
DOB: 01/04/1989

I.C. 35-42-1-1
Murder

I.C. 35-43-2-1
I.C. 35-41-5-1
Burglary (Attempt)
Level 2 Felony

I.C. 35-42-5-1
I.C. 35-41-5-1
Robbery (Attempt)
Level 3 Felony

I.C. 35-44.1-2-2
Obstruction of Justice
Level 6 Felony

I.C. 35-50-2-15
Criminal Gang Enhancement

1. I am a detective with the Indiana State Police.
2. My investigation involves case 21ISPC008526.
3. In support of your Affiant's assertion of Probable Cause, the following facts are within your Affiant's personal knowledge, to-wit:
4. On June 22, 2021, at approximately 4:00 a.m., a 911 call was received by Jefferson County Central Dispatch. The caller identified themselves as Shawn Rudis and stated that multiple individuals had come to his residence at 8913 N. John Deere Road, Dupont, Indiana and had fired guns at him. Deputies with the Jefferson County Sheriff's Office responded and during their initial contact with Rudis, they discovered a deceased male,

later identified as Dustin B. Lindner (W/M DOB: 08/04/1985). Lindner was found wearing a shirt with a patch displaying the Pagan motorcycle club on his right chest.

5. Officers learned the following information contained in this affidavit from witness statements, video surveillance, cellular telephone records, forensic triages of cellular telephones, and other investigative means, as well as evidence collected through consent and judicially authorized search warrants.
6. During this investigation, law enforcement has identified several individuals involved. These individuals are known and often referred to by "street names". The following individuals will be referenced throughout this affidavit by their last names:

<u>Name</u>	<u>Street Name</u>	<u>DOB</u>
Dustin B. Lindner	"Kutter"	DOB: 08/04/1985
Jason W. Brewer	"Dutch"	DOB: 12/25/1986
Michael J. Karnuth	"Billy Goat"	DOB: 01/04/1989
David K. Faulkner	"Karate Dave"	DOB: 10/25/1968
Gary W. Fletcher	"Mouth"	DOB: 09/09/1980
Jordan M. Lowe	"Pooh Bear"	DOB: 05/16/1995
Beka Petro	"Oven"	DOB: 08/31/1998

WhatsApp Messages and Gas Station Encounter

7. Through a forensic triage of Lindner's cell phone, law enforcement found a WhatsApp group chat between Lindner and other individuals which contained references to motorcycle club activity. The label of the WhatsApp chat is listed as "1%ers" and displays an image of "Pagans MC".
8. There are five contacts listed in the group chat: Lindner (the device owner), "Chains", "Kobalt", "Snowman", and "Choke".
9. In the WhatsApp group chat, "Chains" shared multiple photographs from the Facebook profile of Shawn Rudis, and asked if any of the other members of the group chat knew who he was. "Choke" and Lindner both responded that they did not know him and Lindner stated that his "rags" were fake. Lindner then stated, "Some think its a cop fishing." "Chains" responded, "Yes and I know the patches are not his." "Chains" then shared a photograph of a female that he believed could be Rudis's girlfriend. Lindner identified the previous photograph as Rudis's sister and then shared a photograph of

another female that he believed could be Rudis's girlfriend. In the group chat, "Kobalt" states, "Find that fucker!" in reference to Rudis.

10. Through a forensic triage of Lindner's phone, we confirmed Lindner had attempted to communicate with Shawn Rudis using Facebook messenger prior to June 22, 2021.
11. Rudis told officers that approximately two (2) weeks prior to the shooting incident, that he was at a gas station in North Vernon, Indiana. While at the gas station, he spoke to a male subject that he referred to as "Billy Goat" about his affiliation with the Warlock Motorcycle Club. Rudis told officers that he exchanged phone numbers with "Billy Goat". During their conversation, Rudis showed "Billy Goat" his tattoos associated with the Warlock Motorcycle Club and was, by his own admission, antagonistic towards "Billy Goat". Rudis stated that during their conversation, "Billy Goat" indicated that he was going to be president of the Warlocks soon. Rudis stated that "Billy Goat" later contacted him in an effort to meet. Rudis said that although the male subject ensured his safety, he had reservations and ultimately blocked the subject's number. Brewer and Petro (Brewer's girlfriend) also confirmed to officers that they were contacted by Karnuth, and that he told them to come to the gas station to meet Rudis.

Meeting at "Billy Goat's"

12. Indiana State Police Detective, Brent Miller and I travelled to Georgetown, Kentucky to make notification to the decedent's (Lindner's) wife, Deanna Lindner. Deanna advised that she last saw Dustin Lindner on Sunday, June 20, 2021, and that he left in a gold Toyota Camry.
13. Brewer advised officers that prior to going to 8913 North John Deere Road, Dupont, Indiana on June 22, 2021, that he was with Karnuth, Faulkner, Lindner, and Fletcher at Karnuth's residence located at 2155 Country Manor Street, North Vernon, Jennings County, Indiana. Brewer stated that Lindner told the other subjects that they all had families and that he wanted them all to return alive. Brewer stated that Lindner said that they were going to, "get down there, beat the shit out of that guy, take his shit, and leave." Following Lindner's speech, Brewer stated that Karnuth had handed him two firearms and that Karnuth wanted Brewer to carry them because he was "legal". Brewer said that he inquired as to why they needed guns if they were just going to "beat his ass", and that Karnuth responded that he was prepared to shoot back, if needed. Brewer stated that Karnuth instructed him to leave his cell phone at the residence during the commission of the crime because it could be traced by law enforcement.
14. Brewer advised law enforcement that the group at Karnuth's residence had discussed that Rudis had tattoos associated with the Warlock Motorcycle Club and that Rudis also had a "cut" (vest associated with motorcycle clubs) that had a patch for the Pagan Motorcycle Club. Brewer stated that they were going to get the "cut" and ensure that the Rudis's tattoos associated with motorcycle clubs were removed.

First Encounter with Rudis at 8913 N. John Deere Road

15. During an interview with Rudis, he informed law enforcement that two vehicles had travelled to his residence located at 8913 N. John Deere Road, Dupont, Indiana, sometime around midnight on June 22, 2021. Rudis described the vehicles as a red pickup truck and a passenger car. Rudis stated that when the subjects in the vehicles arrived, he was seated in his vehicle. Rudis said that the subjects called him by his first name and stated that they wanted to talk. Rudis said that he drove and parked a short distance away on the property. Rudis said that the individuals left after a short time and he returned to his residence.
16. Brewer told officers that a few hours prior to the shooting incident, that he went with Karnuth, Faulkner, Lindner, and Fletcher to 8913 N. John Deere Road, Dupont, Indiana at approximately 12:30 a.m. on June 22, 2021. Brewer stated that they travelled to the location in the 1996 Ford F-150 and the 2014 Chevrolet Cruze (A BMV inquiry revealed that Brewer is the registered owner of a red, 1996 Ford F-150 truck, and a dark blue, 2014 Chevrolet Cruze). Brewer said that he observed an individual in an SUV on the property. Brewer stated that the subject in the SUV fled to another location on the property upon their arrival. Brewer informed officers that Lindner went to the location the subject had fled and they were able to positively identify the subject as Shawn Rudis. Brewer stated that he and the other subjects then left 8913 N. John Deere Road because Rudis had stated that he had contacted law enforcement. Brewer stated that they went to the Dupont Masonic Lodge where he was instructed to remain until the other four (4) subjects returned. They indicated that if he was not there when they returned, that he would be “dealt with accordingly”. Brewer advised that the other four (4) subjects were going to attempt to contact other members of motorcycle clubs for back-up. Brewer stated that approximately 45 minutes later the other subjects returned to the Masonic Lodge and reported that no other members were able to get to Dupont, Indiana in time. Brewer stated that Karnuth told him that he was the President of the Warlocks and that Lindner was a Sergeant at Arms with the Pagans. Brewer stated that Karnuth told him that when they returned to 8913 N. John Deere Road, Dupont, Indiana, that Karnuth and Lindner could not be in the front vehicle due to their positions within their respective motorcycle clubs.
17. Video footage from a neighboring property owner along John Deere Road, shows two vehicles driving in the direction of Rudis’s residence at approximately 12:29 a.m. on June 22, 2021. That video footage also shows two vehicles leaving the direction of Rudis’s residence at approximately 12:37 a.m.

The Shooting Incident

18. Brewer stated that in addition to himself, the following individuals were present at the time of the shooting and were actively involved in the crime: Karnuth, Lindner, Faulkner, and a then unidentified male subject from Ohio. Through investigative means, I have

determined the unidentified male to be Fletcher. Detective Brent Miller and I subsequently showed Brewer a photo lineup that contained six (6) male individuals, including Fletcher. Brewer was able to positively identify the photo of Fletcher in the photo lineup as "Mouth". Brewer also provided that his nickname or street name of "Dutch" was given to him by Karnuth.

19. Brewer stated that Lindner had two firearms in his possession at the time of the commission of the crime. Brewer stated that Fletcher had two firearms, a 9mm and a 10 mm, that were obtained from Karnuth's residence. Brewer stated that he had previously sold the 9 mm and 10 mm handguns to Karnuth. Brewer informed us that Faulkner had a 9 mm handgun. Brewer stated that Karnuth had a 9 mm in his possession at the time of the commission of the crime.
20. During the shooting incident, Brewer stated the he obtained one of the firearms from the front seat of the red Ford F-150. He stated that the firearm that he grabbed was one of the firearms that Fletcher had brought with him. Brewer admitted to discharging the firearm multiple times after being fired upon by Rudis.
21. Brewer stated that Fletcher discharged the other firearm that he had brought with him after being fired upon by Rudis.
22. Brewer stated that upon leaving the scene immediately following the shooting incident, that he was driving his Ford F-150 and following the Chevrolet Cruze that was being driven by Faulkner. Faulkner then got out of vehicle suddenly and Brewer rear-ended the Chevrolet Cruze. Brewer stated that following the crash of the Ford F-150 and the Chevrolet Cruze, Karnuth discarded two firearms in an area near the crash scene on John Deere Road.
23. I reviewed video from a neighbor that showed two vehicles leaving the scene shortly after the shooting incident prior to law enforcement's arrival. In the video, two vehicles are driving away from the shooting scene on John Deere Road at 4:02 a.m. on June 22, 2021. Sounds of sudden braking and a crash can be heard on the video.
24. ISP Crash Reconstructionist, Matt Holley, investigated the crash scene depicted on the video from the neighboring property owner, and located multiple items of evidence associated with the crash, including vehicle parts.
25. During the course of the investigation, law enforcement went to the Dupont hardware store and obtained video surveillance footage from the night of the incident. Upon review of the footage, law enforcement noticed two vehicles approach the video viewing area from the east at approximately 4:06 a.m. The vehicles then proceed north on State Road 7. The vehicles in the video footage were a dark color passenger car and a red truck. On

the video the dark colored passenger car had damage to the rear passenger area. Also visible in the video, the front driver's side of the truck had damage.

26. Rudis initially told officers that he had previously owned firearms, but that he had recently sold them all within the last two (2) weeks. Rudis had initially reported to Dispatch that he had been shot, but he did not have any visible injuries outside of cuts and scrapes on his legs. In subsequent interviews, Rudis stated that he did, in fact, have a firearm and stated that he fired two shots during the incident. Rudis told law enforcement that the gun that he fired was a .223 rifle and that it would be located in his sister's SUV on the property. ISP Crime Scene Investigators located the .223 rifle in an SUV on the property. Additionally, ISP Crime Scene Investigators located two spent .223 shell casings in the shed where Rudis advised that he had fired from.
27. On June 25, 2021, Rudis spoke with officers at the location of his residence at 8913 North John Deere Road, Dupont, Jefferson County, Indiana. While at the scene, he walked officers through the events and locations of participants as he believed them to have occurred on June 22, 2021.
28. Rudis told officers that he was inside of the shed on the property when he observed headlights and a loud vehicle approaching the property. He said that there two (2) subjects that exited the vehicle and that he could see shadows of the two (2) subjects walking towards his tent on the property. Rudis stated that he saw the individuals with guns in their hands. Rudis said it was obvious they had taken a knife to his tent. I had observed a large L shaped cut in the area of the tent's doorway consistent with Rudis's statement that the tent had been cut with a knife. Rudis heard one of the subjects say, "he's not fucking in there". He then heard the two subjects walking back towards the shed and that his dog was barking in his vehicle next to the shed. Rudis stated that he heard one of the individuals say, "shoot the fucking dog". He then said that he heard two gun shots, and believed that his dog had been shot. Rudis stated that he received a call from his sister on Facebook messenger shortly after the gun shots (which was confirmed through the forensic triage of his cell phone). He stated that about that time, one of the subjects said, "he's in there" (referring to the shed) and that he saw headlights of another vehicle. Rudis remained in the shed, and saw a shadow begin to open a tarp that was covering the entrance of the shed. Rudis stated that he then fired a shot towards the shadow and that he heard a groan. He stated that he didn't hear anything else for what he believed to be a couple of minutes, and then multiple shots were fired into the shed. Rudis stated that he then called 911. While he was on the phone with 911, Rudis stated that he fired off an additional shot in the direction of one of the vehicles. (Officers located a bullet hole in the Chevrolet Cruze consistent with Rudis's statement). Rudis stated that bullets were coming from the direction of the vehicles. He stated that he started screaming at them and that after a while the vehicles left.

Post-Shooting Actions

29. Brewer stated that following the crash he and Fletcher went to 2155 Country Manor Street North Vernon, Jennings County, Indiana and that Karnuth arrived shortly thereafter.
30. Brewer informed us that the firearm that he used during the commission of the crime as well as the firearm used by Fletcher were transported back to Karnuth's residence located at 2155 Country Manor Street, North Vernon, Jennings County, Indiana.
31. Brewer stated that on June 22, 2021 following the commission of the crime, that Karnuth removed several items associated with motorcycle club activity from his residence and placed them in Fletcher's red in color Cadillac Escalade. Brewer stated that later on that same day, that he went with Karnuth and Fletcher to the TA truck stop in Seymour, Indiana.
32. Brewer informed us that while at the TA truck stop, Karnuth's girlfriend, who has been identified as Lowe, arrived in her green passenger car.
33. Brewer stated that items from the Escalade were transferred to Lowe's green passenger car.
34. Brewer stated that he and Karnuth then travelled from Seymour, Indiana to North Vernon, Indiana. Brewer informed officers that Lowe was the driver of the green passenger car from Seymour to North Vernon. While travelling back to North Vernon, Brewer stated that he was given multiple pieces of a handgun, which he identified to be the 10 mm that he used during the commission of the crime, and was advised to throw said pieces into the water at multiple locations along the way. In addition to the pieces of the 10 mm, Brewer stated the he was also instructed to discard pieces of a 9 mm at two different locations of the big lake at Country Squire Lakes.
35. The Indiana State Police Dive Team searched multiple areas along the route that Jason Brewer had provided to officers. The Indiana State Police Dive Team recovered component parts to firearms that Brewer had indicated were discarded on June 22, 2021. At the Vernon fork of the Muscatatuck River, near the intersection of County Road 500 S and 650 W, in Jennings County, Indiana, officers located a slide with attached barrel of a Rock Island Armory 10 mm pistol. Near the intersection of County Road 225 W and 175 S, officers located 9mm bullets a 9mm magazine, and a pistol frame. The items recovered by the Indiana State Police Dive Team were consistent with the statements that Brewer had previously provided regarding the location and items to be located.
36. On June 24, 2021, a search warrant was executed at 2155 Country Manor Street, North Vernon, Jennings County, Indiana. Officers located a box for a Glock firearm. A label on the box indicated that the firearm which it had contained has a serial number of UTA250. During a search of the area of the crash on John Deere Road of the Ford F-150 and Chevrolet Cruze, officers located two firearms. One of the firearms located was a

Glock 19 9mm with a serial number of UTA250. The other firearm recovered from the area of the crash was a SAR 9X.

37. Also, during the execution of the search warrant of 2155 Country Manor Street, North Vernon, Jennings County, Indiana, officers located numerous items associated with the Warlock Motorcycle Club, including clothing, a lighter, business cards, and the bylaws of the Warlock Motorcycle Club.
38. Additionally, during the execution of the search warrant of 2155 Country Manor Street, North Vernon, Jennings County, Indiana, pieces of two letters were discovered in a trash can that are believed to have been authored by Karnuth, based upon the signature at the bottom of each letter. One letter is dated June 17, 2021, and states that it is Karnuth's last will and testament. The other letter indicates that Karnuth and "Dutch" were going to travel to Philadelphia, Pennsylvania. The letter listed the route of travel and provided instructions in the event that Karnuth and "Dutch" did not return (I was advised by Detective Brent Miller that Brewer's girlfriend, Petro, told him that on the evening of Thursday, June 17, 2021, Brewer was travelling to meet more guys associated with the motorcycle club).
39. On June 23, 2021 at approximately 7:30 p.m., Sgt. Kip Main with the Indiana State Police and Detective Aaron Greene with the Jennings County Sheriff's Department located the red 1996 Ford F-150 Truck with damage to the front of the vehicle. The vehicle license plate matched the license plate listed on Brewer's registration.
40. Sgt. Main also visually identified Brewer and Petro. Sgt. Main had previously viewed Brewer's BMV photograph and photographs on his social media account.
41. The vehicle was initially found in front of 2155 Country Manor Street, North Vernon, Jennings County, Indiana. A gold, 2005 Toyota Camry was attached to a car dolly that was being pulled by the red Ford F-150. The Toyota Camry did not have a license plate affixed to it (Brewer stated that Karnuth called him on June 23, 2021 and told him to get rid of the gold Toyota Camry). Sgt. Main followed the red Ford F-150 and ultimately found it stopped in front of 425 Maple Lane, North Vernon, Jennings County, Indiana.

Motorcycle Club Involvement

42. In addition to the information contained above regarding motorcycle club involvement, law enforcement has discovered additional information regarding the subjects' participation in motorcycle club activity.
43. During the course of this investigation, law enforcement viewed Lowe's Facebook profile. Lowe has a photograph on her profile of a subject wearing a vest with markings associated with motorcycle club activity. The vest states, "Property of Billy Goat Indiana."

44. Throughout the investigation, we noticed multiple photographs of the individuals involved in this investigation posed together wearing Pagan and Warlock motorcycle club clothing and displaying gang-related hand signs.
45. Detective Andrew Mitchell located several photographs while triaging the cell phones belonging to Lindner and Brewer indicative of membership in motorcycle clubs. Photographs depicting Brewer, Faulkner, Lindner, and Karnuth in motorcycle club clothing and engaging in activities associated with motorcycle clubs were found on the devices.
46. All of which gives me probable cause to believe that the crimes of Murder, Attempted Burglary, Level 2 Felony, Attempted Robbery, Level 3 Felony, and Obstruction of Justice, Level 6 Felony, have been committed by Michael J. Karnuth. The facts contained in this affidavit also gives me probable cause to believe that Michael J. Karnuth was a member of a criminal organization while committing a felony offense with intent to benefit, promote, or further the interest of a criminal organization. I make this statement not as a complete statement of the facts, but only to establish probable cause.
47. I affirm under the penalties for perjury that the foregoing representations are true.
Dated this 28th day of June, 2021.

/s/ Nate Adams
Detective Nate Adams
Indiana State Police