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BARBARA A. WIEDENBEIN
CLERK OF COMMON PLEAS
CLERMONT COUNTY, OH

**CLERMONT COUNTY COMMON PLEAS COURT
GENERAL DIVISION**

State of Ohio,)	CASE NO.	2023 CR 000407
)	JUDGE	Richard Ferenc
VS.)	<u>Bill of Particulars</u>	
Chad C. Doerman,)		
)		
Defendant.)		

Responding to the request of the Defendant, Chad C. Doerman, for a Bill of Particulars, the Chief Assistant Prosecuting Attorney says that the State of Ohio will prove on the trial of the above-entitled case, the following:

Indictment for Chad C. Doerman 6/22/2023

- **Count 1: Aggravated Murder, § 2903.01(A)**

That on or about 06/15/2023, and at the location of , the Defendant, Chad C. Doerman, did purposely, and with prior calculation and design, cause the death of Cl.D. contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or,

if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Ch.D., Cl.D., and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and [REDACTED] join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through

the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] and [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons [REDACTED].

Count 1 specifically applies to the purposeful killing of [REDACTED], done with prior calculation and design.

- **Count 2: Aggravated Murder, § 2903.01(A)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely, and with prior calculation and design, cause the death of H.D. contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or,

if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Ch.D., Cl.D., and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through

the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons [REDACTED].

Count 2 specifically applies to the purposeful killing of [REDACTED] done with prior calculation and design.

- **Count 3: Aggravated Murder, § 2903.01(A)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely, and with prior calculation and design, cause the death of Ch.D. contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or,

if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Ch.D., C.I.D., and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age.

On June 15, 2023, the defendant returned early from work, and had his family, including his wife, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son twice.

Immediately, began to render aid to and yelled for her other children to run. Just prior to the shooting, who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after screaming at him to keep running. She witnessed the defendant chase after and witnessed the defendant begin shooting at as he fled. was struck by gunfire, knocking him to the ground. watched as the defendant then approached The defendant turned and looked at, then turned back to, and fired one shot into head at close range.

then turned and fled back into the residence where she picked up the youngest child, and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard crying. immediately began running with As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at He demanded that she put down. begged the defendant not to shoot her, and put down. She then witnessed the defendant attempt to shoot in the head, however the gun did not fire and it appeared he was out of ammunition. then fled to his mother, who was in the side yard attempting to render aid to

After the defendant held the rifle to head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After fled, was able to pick up The defendant and engaged in a physical altercation over during which the defendant attempted to pull from grasp, going so far as to bite her to get to let go. During the altercation, grabbed the firearm, placing her thumb over the barrel. The defendant shot through

the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kills his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED]

Count 3 specifically applies to the purposeful killing of [REDACTED], done with prior calculation and design.

- **Count 4: Aggravated Murder, § 2903.01(B)**

That on or about 06/15/2023, and at the location of , the Defendant, Chad C. Doerman, did purposely cause the death of, Cl.D. while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of kidnapping contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the

offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Cl.D., Ch.D. and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age.

On June 15, 2023, the defendant returned early from work, and had his family, including his wife, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son twice.

Immediately, began to render aid to, and yelled for her other children to run. Just prior to the shooting, who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after screaming at him to keep running. She witnessed the defendant chase after and witnessed the defendant begin shooting at as he fled. was struck by gunfire, knocking him to the ground. watched as the defendant then approached. The defendant turned and looked at then turned back to, and fired one shot into's head at close range.

then turned and fled back into the residence where she picked up the youngest child, and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard crying. immediately began running with. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at. He demanded that she put down. begged the defendant not to shoot her, and put down. She then witnessed the defendant attempt to shoot in the head, however the gun did not fire and it appeared he was out of ammunition. then fled to his mother, who was in the side yard attempting to render aid to.

After the defendant held the rifle to head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After fled, was able to pick up. The defendant and engaged in a physical altercation over during which the defendant attempted to pull from grasp, going so far as to bite her to get to let go. During the altercation,

█████ grabbed the firearm, placing her thumb over the barrel. The defendant shot █████ through the thumb. After being shot and bit, █████ ultimately dropped █████. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute █████, shooting him at close range once in the head. █████ was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched █████ undertake futile life-saving measures on her three children.

█████ was shot one time at close range in the head, while █████ were both shot four times. All three boys died as a result of their injuries.

█████ has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender █████ to the defendant for his execution, and witnessing her step-father execute her brothers.

█████ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot █████ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, █████.

Count 4 specifically applies to the purposeful killing of █████, while committing or attempting to commit, or fleeing immediately after committing or attempting to commit the offense of kidnapping.

- **Count 5: Aggravated Murder, § 2903.01(B)**

That on or about 06/15/2023, and at the location of █████, the Defendant, Chad C. Doerman, did purposely cause the death of █████, H.D. while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of kidnapping contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Ch.D., Cl.D. and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] [REDACTED] [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED] The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED] As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED] He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED]

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED] The defendant and [REDACTED] engaged in a

physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 5 specifically applies to the purposeful killing of [REDACTED] while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of kidnapping.

- **Count 6: Aggravated Murder, § 2903.01(B)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely cause the death of [REDACTED], Ch.D. while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of kidnapping contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in

the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: C.I.D., H.D. and Ch.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED]. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 6 specifically applies to the purposeful killing of [REDACTED] done while committing or attempting to commit, or fleeing immediately committing or attempting to commit a kidnapping.

- **Count 7: Aggravated Murder, § 2903.01(C)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely cause the death of C.I.D., who was under the age of thirteen years of age at the time of the commission of the offense, to wit, C.I.D., [REDACTED] contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or

facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: C.I.D., Ch.D. and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED]. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was “killing everyone” as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant’s actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of

the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] let [REDACTED]. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kills his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons. [REDACTED]

Count 7 specifically applies to the purposeful killing of [REDACTED] who was under 13 years of age at the time of the offense.

- **Count 8: Aggravated Murder, § 2903.01(C)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely cause the death of H.D., who was under the age of thirteen years of age at the time of the commission of the offense, to wit, H.D., [REDACTED] contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or

facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: H.D., C.I.D. and Ch.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED] The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED] As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED] He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED]

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was “killing everyone” as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant’s actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of

the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 7 specifically applies to the purposeful killing of [REDACTED] who was under 13 years of age at the time of the offense.

- **Count 9: Aggravated Murder, § 2903.01(C)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did purposely cause the death of Ch.D., who was under the age of thirteen years of age at the time of the commission of the offense, to wit, Ch.D., DOB: [REDACTED] contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, the offense at bar was committed while the offender was committing, attempting to commit, or fleeing immediately after committing or attempting to commit kidnapping, and either the offender was the principal offender in the commission of the aggravated murder or, if not the principal offender, committed the aggravated murder with prior calculation and design.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or

facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

FURTHERMORE, the offender, in the commission of the offense, purposefully caused the death of another who was under thirteen years of age at the time of the commission of the offense, and either the offender was the principal offender in the commission of the offense, or, if not the principal offender, committed the offense with prior calculation and design.

FURTHERMORE, the offense at bar was part of a course of conduct involving the purposeful killing of or attempt to kill two or more persons, to wit: Ch.D., Cl.D. and H.D. by the offender.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED]. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of

the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 8 specifically applies to the purposeful killing of [REDACTED] who was under 13 years of age at the time of the offense.

- **Count 10: Kidnapping, § 2905.01(A)(3)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove C.I.D. from the place where he was found or restrain the liberty of him for the purpose of terrorizing or inflicting serious physical harm upon C.I.D. or another contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause

the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot Laura through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

██████████ was shot one time at close range in the head, while ██████████ were both shot four times. All three boys died as a result of their injuries.

██████████ has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender ██████████ to the defendant for his execution, and witnessing her step-father execute her brothers.

██████████ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot ██████████ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, ██████████

Count 10 specifically applies to the defendant by force, threat or deception, removing C.I.D. from the place where he was found, or restrained the liberty of ██████████ for the purpose of terrorizing or inflicting serious physical harm upon ██████████ or another.

- **Count 11: Kidnapping, § 2905.01(A)(3)**

That on or about 06/15/2023, and at the location of ██████████, the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove H.D. from the place where he was found or restrain the liberty of him for the purpose of terrorizing or inflicting serious physical harm upon H.D. or another contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. ██████████

On June 15, 2023, the defendant returned early from work, and had his family, including his wife, ██████████, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son ██████████ twice.

Immediately, ██████████ began to render aid to ██████████ and yelled for her other children to run. Just prior to the shooting, ██████████ who had been

watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail."

"I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 11 specifically applies to the defendant by force, threat or deception, removing [REDACTED] from the place where he was found, or restrained the liberty of [REDACTED] for the purpose of terrorizing or inflicting serious physical harm upon [REDACTED] or another.

- **Count 12: Kidnapping, § 2905.01(A)(3)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove Ch.D. from the place where he was found or restrain the liberty of him for the purpose of terrorizing or inflicting serious physical harm upon Ch.D. or another contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the

defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 1 specifically applies to the purposeful killing of [REDACTED] done with prior calculation and design.

Count 12 specifically applies to the defendant by force, threat or deception, removing [REDACTED] from the place where he was found, or restrained the liberty of [REDACTED] for the [REDACTED].

purpose of terrorizing or inflicting serious physical harm upon [REDACTED] or another.

- **Count 13: Kidnapping, § 2905.01(A)(3)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, [REDACTED] did, by force, threat, or deception, remove A.L.S. from the place where she was found or restrain the liberty of her for the purpose of terrorizing or inflicting serious physical harm upon A.L.S. or another contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED] and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED]'s head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 13 specifically applies to the defendant by force, threat or deception, removing [REDACTED] from the place where he was found, or restrained the liberty of [REDACTED] for the purpose of terrorizing or inflicting serious physical harm upon [REDACTED] or another.

- **Count 14: Kidnapping, § 2905.01(A)(2)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove C.I.D. from the place where he was found or restrain the liberty of him for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder, R.C. 2903.01(A), 2903.01(B), or 2903.01(C) or flight thereafter contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his

control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED] [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED] then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED] and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was “killing everyone” as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant’s actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED].

grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED].

Count 14 specifically applies to the defendant by force, threat or deception, removing [REDACTED] from the place where he was found, or restrained the liberty of [REDACTED] for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder.

- **Count 15: Kidnapping, § 2905.01(A)(2)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove H.D. from the place where he was found or restrain the liberty of him for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder, R.C. 2903.01(A); 2903.01(B), or 2903.01(C) or flight thereafter contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED]

[REDACTED]. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant jumped out of bed, grabbed a .22 rifle from the gun safe next to the bed, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED], and yelled for her other children to run. Just prior to the shooting, [REDACTED], [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. One of the rounds the defendant fired struck [REDACTED], knocking him to the ground. [REDACTED] watched as the defendant approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED] and fired one shot into On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age.

[REDACTED] On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED], and yelled for her other children to run. Just prior to the shooting, [REDACTED] fourteen year old daughter, [REDACTED], who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED] and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe

Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED]

Count 15 specifically applies to the defendant by force, threat or deception, removing [REDACTED] from the place where he was found, or restrained the liberty of [REDACTED]. for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder.

- **Count 16: Kidnapping, § 2905.01(A)(2)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove Ch.D. from the place where he was found or restrain the liberty of him for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder, R.C. 2903.01(A); 2903.01(B), or 2903.01(C) or flight thereafter contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm,

indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED] and [REDACTED]

On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED], and yelled for her other children to run. Just prior to the shooting, [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED] who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation,

█████ grabbed the firearm, placing her thumb over the barrel. The defendant shot █████ through the thumb. After being shot and bit, █████ ultimately dropped █████. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute █████, shooting him at close range once in the head. █████ was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched █████ undertake futile life-saving measures on her three children.

█████ was shot one time at close range in the head, while █████ were both shot four times. All three boys died as a result of their injuries.

█████ has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender █████ to the defendant for his execution, and witnessing her step-father execute her brothers.

█████ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot █████ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, █████.

Count 16 specifically applies to the defendant by force, threat or deception, removing █████ from the place where he was found, or restrained the liberty of █████ for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder.

- **Count 17: Kidnapping, § 2905.01(A)(2)**

That on or about 06/15/2023, and at the location of █████, the Defendant, Chad C. Doerman, did, by force, threat, or deception, remove A.L.S. from the place where she was found or restrain the liberty of her for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder, R.C. 2903.01(A); 2903.01(B), or 2903.01(C) or flight thereafter contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. █████.

█████. On June 15, 2023, the defendant returned early from work, and

had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED] and yelled for her other children to run. Just prior to the shooting, [REDACTED], who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED] and fired one shot into [REDACTED]'s head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

██████████ has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender ██████████ to the defendant for his execution, and witnessing her step-father execute her brothers.

██████████ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot ██████████ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, ██████████.

Count 17 specifically applies to the defendant by force, threat or deception, removing ██████████ from the place where he was found, or restrained the liberty of ██████████ for the purpose of facilitating the commission of a felony, to wit: Aggravated Murder.

- **Count 18: Felonious Assault, § 2903.11(A)(2)**

That on or about 06/15/2023, and at the location of ██████████, the Defendant, Chad C. Doerman, did knowingly cause or attempt to cause physical harm to A.L.S. by means of a deadly weapon or dangerous ordnance, to wit: firearm contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of Marlin Model HC .22 Rifle which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense and is subject to forfeiture pursuant to 2941.1417 (A), 2981.02, and 2981.04 of the Revised Code.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. ██████████

██████████. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, ██████████, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son ██████████ twice.

Immediately, ██████████ began to render aid to ██████████ and yelled for her other children to run. Just prior to the shooting, ██████████, who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that ██████████ ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after ██████████ screaming at him to

keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED] during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview

that the thoughts of having to kills his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, ██████████

Count 18 specifically applies to the defendant knowingly attempting to cause physical harm to ██████████ by means of a deadly weapon, to wit: a firearm.

- **Count 19: Felonious Assault, § 2903.11(A)(1)**

That on or about 06/15/2023, and at the location of , the Defendant, Chad C. Doerman, did knowingly cause serious physical harm to A.L.S. contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. ██████████

██████████ On June 15, 2023, the defendant returned early from work, and had his family, including his wife, ██████████, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his ██████████ twice.

Immediately, ██████████ began to render aid to ██████████ and yelled for her other children to run. Just prior to the shooting, ██████████ who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that ██████████ ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after ██████████ screaming at him to keep running. She witnessed the defendant chase after ██████████ and witnessed the defendant begin shooting at ██████████ as he fled. ██████████ was struck by gunfire, knocking him to the ground. ██████████ watched as the defendant then approached ██████████. The defendant turned and looked at ██████████, then turned back to ██████████ and fired one shot into ██████████ head at close range.

██████████ then turned and fled back into the residence where she picked up the youngest child, ██████████, and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard ██████████ crying. ██████████ immediately began running with ██████████. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at ██████████. He demanded that she put ██████████ down. ██████████ begged the defendant not to shoot her, and put ██████████ down. She then witnessed the defendant attempt to shoot ██████████ in the head, however the gun did not fire and it appeared he was out of ammunition. ██████████ then fled to his mother, ██████████ who was in the side yard attempting to render aid to

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED], shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

[REDACTED] suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot [REDACTED] and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kill his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, [REDACTED]

Count 19 specifically applies to the defendant knowingly causing serious physical (psychological) harm to [REDACTED]

- **Count 20: Felonious Assault, § 2903.11(A)(2)**

That on or about 06/15/2023, and at the location of [REDACTED], the Defendant, Chad C. Doerman, did knowingly cause or attempt to cause physical harm to L.R.D. by means of a deadly weapon or dangerous ordnance, to wit: firearm contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm,

indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. [REDACTED] and [REDACTED]

[REDACTED]. On June 15, 2023, the defendant returned early from work, and had his family, including his wife, [REDACTED], and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED], and yelled for her other children to run. Just prior to the shooting, [REDACTED], [REDACTED] who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED], and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED]'s head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED]

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED] grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation,

█████ grabbed the firearm, placing her thumb over the barrel. The defendant shot █████ through the thumb. After being shot and bit, █████ ultimately dropped █████. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute █████, shooting him at close range once in the head. █████ was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched █████ undertake futile life-saving measures on her three children.

█████ was shot one time at close range in the head, while █████ were both shot four times. All three boys died as a result of their injuries.

█████ has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender █████ to the defendant for his execution, and witnessing her step-father execute her brothers.

█████ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot █████ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kills his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, █████.

Count 20 specifically applies to the defendant knowingly causing physical harm to █████ by means of a deadly weapon, to wit: a firearm.

• **Count 21: Felonious Assault, § 2903.11(A)(1)**

That on or about 06/15/2023, and at the location of █████, the Defendant, Chad C. Doerman, did knowingly cause serious physical harm to L.R.D. contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

FURTHERMORE, Chad C. Doerman had a firearm on or about his person or under his control while committing the offense and displayed the firearm, brandished the firearm, indicated that he possessed the firearm, or used it to facilitate the offense.

FURTHERMORE, Chad C. Doerman is the owner and/or possessor of a Marlin Model HC .22 Rifle, which was contraband and/or property derived from or through the commission or facilitation of the offense, and/or was an instrumentality the offender used or intended to use in the commission or facilitation of the offense.

On or about June 15, 2023, at 1965 Laurel Lindale Rd., New Richmond, OH 45157, in Clermont County, Ohio, the defendant did purposely and with prior calculation and design cause the death of his three children, and all three children were under the age of thirteen (13) years of age. █████; and █████

On June 15, 2023, the defendant returned early from work, and had his family, including his wife, █████, and his three sons join him in the master bedroom for a nap. At some point after lying down with the four of them, the defendant got out of bed, opened the gun safe next to the bed, removed a Marlin Model HC .22 rifle from the gun safe and a loaded magazine. The defendant then inserted the magazine into the rifle, and shot his

son [REDACTED] twice.

Immediately, [REDACTED] began to render aid to [REDACTED], and yelled for her other children to run. Just prior to the shooting, [REDACTED], who had been watching television in the family room, made her way to the master bedroom and witnessed the shooting. She immediately began to run, and indicated that [REDACTED] ran the wrong way, i.e. out of the rear door of the residence and towards a field. She ran after [REDACTED] screaming at him to keep running. She witnessed the defendant chase after [REDACTED] and witnessed the defendant begin shooting at [REDACTED] as he fled. [REDACTED] was struck by gunfire, knocking him to the ground. [REDACTED] watched as the defendant then approached [REDACTED]. The defendant turned and looked at [REDACTED], then turned back to [REDACTED], and fired one shot into [REDACTED] head at close range.

[REDACTED] then turned and fled back into the residence where she picked up the youngest child, [REDACTED], and attempted to flee the residence with him. As she attempted to flee the defendant returned to the residence and heard [REDACTED] crying. [REDACTED] immediately began running with [REDACTED]. As she approached the road, the defendant caught up to her, raised the rifle, and pointed the firearm at [REDACTED]. He demanded that she put [REDACTED] down. [REDACTED] begged the defendant not to shoot her, and put [REDACTED] down. She then witnessed the defendant attempt to shoot [REDACTED] in the head, however the gun did not fire and it appeared he was out of ammunition. [REDACTED] then fled to his mother, [REDACTED], who was in the side yard attempting to render aid to [REDACTED].

After the defendant held the rifle to [REDACTED] head, she proceeded to flee towards the Monroe Township Fire Department. She was stopped by a passerby and advised the witness that her father was "killing everyone" as she continued to flee towards the fire department. [REDACTED] has suffered serious psychological harm as a result of the defendant's actions.

At some point, the defendant went back out to the field and carried [REDACTED] back to the side of the residence, and laid his body in the yard where all three children were ultimately found.

After [REDACTED] fled, [REDACTED] was able to pick up [REDACTED]. The defendant and [REDACTED] engaged in a physical altercation over [REDACTED], during which the defendant attempted to pull [REDACTED] from [REDACTED]s grasp, going so far as to bite her to get [REDACTED] to let [REDACTED] go. During the altercation, [REDACTED] grabbed the firearm, placing her thumb over the barrel. The defendant shot [REDACTED] through the thumb. After being shot and bit, [REDACTED] ultimately dropped [REDACTED]. During the chaos, the defendant also attempted to reload his firearm. The defendant then proceeded to execute [REDACTED] shooting him at close range once in the head. [REDACTED] was ultimately laid in the same area as his brothers on the side of the residence. After the defendant executed all three boys, he sat on the side stoop of the residence and calmly watched [REDACTED] undertake futile life-saving measures on her three children.

[REDACTED] was shot one time at close range in the head, while [REDACTED] were both shot four times. All three boys died as a result of their injuries.

[REDACTED] has suffered serious psychological harm as a result of being held at gunpoint, forced to surrender [REDACTED] to the defendant for his execution, and witnessing her step-father execute her brothers.

_____ suffered serious physical harm when she was shot through the thumb.

The defendant made multiple statements to law enforcement, such as, "I did it. Take me to jail.", "I shouldn't have done that. I shouldn't have shot _____ and them." The defendant also gave a statement during an audio and video recorded interview, during which he admitted to having been thinking about shooting his sons since October. He further indicated during that interview that the thoughts of having to kills his sons was so heavy on him that he hadn't slept for three or four days prior to murdering his three sons, _____

Count 21 specifically applies to the defendant knowingly causing serious physical harm to _____

See Response to Request for Discovery for further information.

The Chief Assistant Prosecuting Attorney says further that under the laws governing Indictments and Bills of Particulars, the Chief Assistant Prosecuting Attorney is not required to disclose through a Bill of Particulars, the other evidentiary matters requested in the Defendant's Motion for a Bill of Particulars.

Respectfully submitted,



BY: Lara Baron Allen ##0080788

Chief Assistant Prosecuting Attorney
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SERVICE

A copy of the foregoing Bill of Particulars has been served electronically on July 07, 2023 upon:
Gregory W Meyers, Attorney for Defendant, at: <https://docs.matrixexchange.com/>

(Select the option below to indicate service by U.S. mail)

_____ If selected, a copy of the foregoing Bill of Particulars has been mailed this _____ day
of _____, 2023, to:

Gregory W Meyers,
Attorney for Chad C. Doerman, at:
250 E. Broad Street, Suite 1400
Columbus, OH 43215
Franklin County



BY: Lara Baron Allen ##0080788

Chief Assistant Prosecuting Attorney