

STATE OF INDIANA)
) SS:
COUNTY OF JACKSON)

**IN THE JACKSON CIRCUIT COURT
ANNUAL TERM 2023**

CAUSE NUMBER. 36C01-2310-MR-1

INFORMATION FOR:

**Count 1:
Aiding, Inducing, or Causing Murder
I.C. 35-42-1-1(1) and I.C. 35-41-2-4
a Felony**

**Count 2:
Aiding, Inducing, or Causing Murder
I.C. 35-42-1-1(2) and I.C. 35-41-2-4
a Felony**

**Count 3:
Conspiracy to Commit Murder
I.C. 35-42-1-1(1) and I.C. 35-41-5-2
a Level 1 Felony**

**Count 4:
Aiding, Inducing, or Causing Consumer
Product Tampering
I.C. 35-45-8-3(1) and I.C. 35-41-2-4
a Level 4 Felony**

STATE OF INDIANA

VS

**ASHLEY NICOLE JONES
DOB: 11/22/1993
SSN: XXX-XX-3269**

Count 1:

The undersigned says that between December 19, 2022 and December 20, 2022 in Jackson County, State of Indiana, Ashley Nicole Jones did knowingly or intentionally kill another human being, to-wit: Harold Allen, contrary to the form of the statutes in such cases made and provided by I.C. 35-42-1-1(1) and I.C. 35-41-2-4 and against the peace and dignity of the State of Indiana.

Count 2:

The undersigned says that between December 19, 2022 and December 20, 2022 in Jackson County, State of Indiana, Ashley Nicole Jones, did knowingly or intentionally kill another human being, to wit: Harold Allen; while committing or attempting to commit the offense of consumer product tampering, which is to knowingly or intentionally introduce a poison, a harmful substance, or a harmful foreign object into a consumer product that has been entered into commerce, to-wit: root beer, contrary to the form of the statutes in such cases made and provided by I.C. 35-42-1-1(2) and I.C. 35-41-2-4 and against the peace and dignity of the State of Indiana.

Count 3:

The undersigned says that between November 1, 2022 and December 20, 2022 in Jackson County, State of Indiana, Ashley Nicole Jones did, with the intent to commit the felony offense of murder, agree with another person, to-wit: Marsha Allen, to commit said felony offense of murder, which is to knowingly or intentionally kill another human, to-wit: Harold Allen, and Ashley Nicole Jones did commit an overt act in furtherance of the agreement, to-wit: did purchase ethylene glycol, and/or did research various poisons, and/or did advise Marsha Allen about the effects on the human body of various poisons, and said conspiracy did result in the death of Harold Allen, contrary to the form of the statutes in such cases made and provided by I.C. 35-42-1-1(1) and I.C. 35-41-5-2 and against the peace and dignity of the State of Indiana.

Count 4:

The undersigned says that between December 19, 2022 and December 20, 2022 in Jackson County, State

of Indiana, Ashley Nicole Jones did recklessly, knowingly or intentionally introduce a poison, harmful substance, or harmful foreign object, to-wit: ethylene glycol; into a consumer product, to-wit: root beer; and that said act resulted in serious bodily injury to Harold Allen, to-wit: death, contrary to the form of the statutes in such cases made and provided by I.C. 35-45-8-3(1) and I.C. 35-41-2-4 and against the peace and dignity of the State of Indiana.

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

 /s/ Jeffrey A. Chalfant
Jeff Chalfant
Prosecuting Attorney

WITNESSES: Justin Amos laboratory analyst Clint Burcham Schneck Medical Center
 Coroner Jesse Hutchinson
J L McElfresh Adam Nicholson Steven White