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# STATE OF INDIANA MARION COUNTY, ss:

#### STATE OF INDIANA

vs.

Raymond Ronald Lee Childs III B/Male DOB: 10/31/2003

#### IN THE MARION SUPERIOR COURT CRIMINAL DIVISION

Cause No: 49D29

**INFORMATION COUNTI** MURDER I.C. 35-42-1-1(1) A FELONY **COUNT II MURDER** I.C. 35-42-1-1(1) **A FELONY COUNT III** MURDER I.C. 35-42-1-1(1) **A FELONY COUNT IV MURDER** I.C. 35-42-1-1(1) A FELONY **COUNT V MURDER** I.C. 35-42-1-1(1) A FELONY **COUNT VI** MURDER I.C. 35-42-1-1(4) **A FELONY COUNT VII** ATTEMPTED MURDER I.C. 35-42-1-1(1) and I.C. 35-41-5-1(a) A LEVEL 1 FELONY **COUNT VIII** CARRYING A HANDGUN WITHOUT A LICENSE I.C. 35-47-2-1 A CLASS A MISDEMEANOR

On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on her oath, says that in Marion County, Indiana

# **COUNT I**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally kill another human being, to-wit: Raymond Childs Jr.;

### **COUNT II**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally

kill another human being, to-wit: Kezzie Childs;

# **COUNT III**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally

kill another human being, to-wit: Elijah Childs;

# **COUNT IV**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally kill another human being, to-wit: R.C.;

# **COUNT V**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally kill another human being, to-wit: Kiara Hawkins;

# **COUNT VI**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly or intentionally kill a fetus, to-wit: Kiara Hawkins' unborn fetus;

# **COUNT VII**

On or about January 24, 2021, Raymond Ronald Lee Childs III did attempt to commit the crime of Murder, which is to intentionally kill another human being, namely: X.C., by engaging in conduct, that is: shooting X.C. with the specific intent to kill X.C., which conduct constituted a substantial step toward the commission of said crime of Murder;

# **COUNT VIII**

On or about January 24, 2021, Raymond Ronald Lee Childs III did knowingly carry a handgun in a vehicle or on or about his person, without being licensed as required by law;

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

<u>January 28, 2021</u> Date

**RYAN MEARS** Marion County Prosecutor 19th Judicial Circuit

/s/ Amy Jacobson

**Deputy Prosecuting Attorney** 

State's Witnesses: C. WINTER, IMPD E. FORESTAL, IMPD J. HURT, IMPD D. KISTNER, IMPD M. KLONNE, IMPD C. LAWRENCE, IMPD D. SCHILDE, IMCFSA

T. SPEARS, IMCFSA D. Stanton, APD Gregory Schmunk M.D., MCCO X. C. J. D. T. K. K. S. A. V. E. V. K.C. K. J.

# AFFIDAVIT FOR PROBABLE CAUSE

#### STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Christopher Winter swears (affirms) that:

In support of your affiant's assertion of probable cause, the following facts are within your affiant's personal knowledge or have been learned through his investigation:

On January 24<sup>th</sup>, 2021 at approximately 3:43 AM, officers with the Indianapolis Metropolitan Police Department were dispatched to 33XX E. 36<sup>th</sup> street in Marion County, Indiana, on reports of a person shot. Upon arrival, officers found X.C., age 15, on the porch of the residence suffering from multiple gunshot wounds. The occupants of the house had called 911 after they heard gunshots and someone yelling for help. X.C. was transported to Riley Hospital in critical condition. Officer Andrew Guzman arrived at the hospital and was able to speak with X.C. before he was rushed into surgery. When X.C. was asked who shot him, he stated "Raymond Ronald Lee Childs, the third." Officer Guzman was also present when medical staff spoke with X.C. about locating his parents so that they could provide further medical care. X.C. stated "He shot them. I think they're dead."

Upon receiving this information, Sgt. Daniel Kistner responded to X.C.'s address, 35XX N. Adams Street and found an open front door. Upon entering the two story, three bedroom brick house, Sgt. Kistner and other officers located five people suffering from gunshot wounds. A pregnant female, later identified as Kiara Hawkins, age 19, was transported to Eskenazi Hospital. Despite efforts to save Kiara Hawkins and her unborn child, both were declared deceased at the hospital. The male fetus was delivered via emergency cesarean section and was declared deceased upon delivery.

The four other people located in the Adams Street address were pronounced deceased at the scene. They were later identified as Raymond Childs, Jr., age 42, Kezzie Childs, age 42, Elijah Childs, age 18, and R.C., age 13.

Three of the deceased were found by officers on the first floor. Officers found Elijah Childs on a bed in a bedroom at the end of the hallway. Kiara Hawkins was found on the bed next to Elijah prior to being transported to the hospital. R.C. was found in a second bedroom off the upstairs hallway on the floor next to the bed.

Raymond Childs, Jr. was located in the basement on the floor next to a dresser in the open space that was being used as a bedroom. Kezzie Childs was located on the floor nearby next to the bed.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

#### Affidavit for Probable Cause

From: Detective Christopher Winter

Officers requested that a Homicide detective respond to the scene. Detective Christopher Winter responded along with Detective James Hurt, Detective Sgt. Chris Lawrence and Detective Lt. Eli McAllister. A Crime Scene Specialist from the Marion County Crime Lab, Daniel Schilde, also responded to the scene. Schilde performed a walk-through of the crime scene with the detectives. They observed fired 9mm cartridge casings, fired 7.62 cartridge casings, a 9mm handgun, and a box of 7.62 ammunition. Two fired 9mm cartridge casings were found in the room where Elijah Childs and Kiara Hawkins had been found. One fired 7.62 cartridge casing was found in the room containing the body of R.C. Six fired 9mm cartridge casings were found in the basement room containing the bodies of Raymond Childs, Jr. and Kezzie Childs. The 9mm handgun was found in the basement. The slide was locked back and the chamber was empty. Five fired 7.62 cartridge casings were found in the basement room containing the bodies of Raymond Childs, Jr. and Kezzie Childs. Jr. and Kezzie Childs.

Located in the third upstairs bedroom containing bunk beds, where no bodies were found, was a high school identification card for Raymond Childs. Several phones were also found in the home including a black Android with a gray case found on the bed in the basement room where Raymond Childs, Jr.'s body was located. A second crime scene was located on the street in front of 33XX E. 36<sup>th</sup> Street, the residence where X.C. had been found. There detectives located four fired 7.62 cartridge casings along with U.S. currency that was covered in blood.

Several friends and family members of the Childs family gathered near the scene while the Marion County Crime Lab was processing the home. K.S. spoke with officers on scene. K.S. stated that her step-dad, Raymond Childs, Jr. and his wife Kezzie Childs lived in the residence at 35XX Adams Street. Also living at the residence were Raymond and Kezzie's biological children: R.C., X.C., and Elijah Childs. Elijah's girlfriend "KiKi" (Kiara Hawkins) also lived at the residence. Smith stated her brother, Raymond Ronald Lee Childs III, lived at the residence as well, but that she knew he wasn't currently inside because he had called her sister Naomi earlier in the morning and Smith had spoken to him. Childs III said he had stayed out all night and didn't go home. Smith also stated that she knew he was ok because she had seen him at the scene just before speaking with detectives.

T.K. approached officers and stated her parents lived at 35XX Adams Street. T.K. told officers that she was visiting her family at the residence the night before. She had come over in the afternoon on January 23<sup>rd</sup>, and left around 2:00 or 2:30 a.m. the morning of the shooting. She said her parents were lying in bed watching television in the basement when she left.

Detectives canvassed the area and spoke with neighbors who stated one of the boys who lives at the house drives a white Chrysler with fancy rims. That vehicle was not located at or near the residence.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

#### Affidavit for Probable Cause

From: Detective Christopher Winter

While on scene, detectives learned that X.C. had made it through surgery at Riley Hospital. Detectives Christopher Winter and James Hurt responded to Riley Hospital at approximately 4:23 PM to interview him. X.C. stated that his brother "Raymond Ronald Lee Childs the third" shot him. When asked who else was in the house at the time of the shooting, X.C. stated his mom, his dad, his little sister R.C., his brother Elijah, and Kiara Hawkins, who was "supposed to be having a baby next week." According to X.C., Childs III had gotten in trouble that night for leaving the house without permission. When Childs III got home his father Raymond Childs, Jr. told Childs III that he would be in trouble later. X.C. was downstairs with his parents when he heard two or three gunshots from upstairs. X.C. heard his sister say "he shot Elijah!" X.C. said Childs III came down the stairs and shot both of his parents. At this point X.C. said he was in the laundry room on the floor, and when he heard the shooting stop he ran out of the house through a side door as fast as he could. Childs III chased him down. X.C. told him "I can give you forty dollars, please don't kill me." X.C. said "he just looked at me and then he shot me on the leg. I fell. He shot me in my arm. And then he tried to shoot me in my head but missed, I guess." X.C. stated Childs III shot him with a Draco 7.62.

IMPD Officers with the Violent Crime Unit went to Childs III's place of employment, Kentucky Fried Chicken, and spoke with a manager. The manager stated J.D. was Childs III's girlfriend and that she also worked at that location. J.D. had notified the manager that both she and Childs III would not be coming in today. Detectives went to J.D.'s residence and found a Chevy Impala that was registered to J.D. backing out of the address. Parked in front of J.D.'s residence was a white Chrysler with fancy rims. The Chrysler was bearing plate 724ZSU and was registered to Raymond Childs, Jr.

Following a valid traffic stop, detectives asked J.D. where Childs III was. J.D. told Detectives that Childs III was at 42XX Burkhart South Drive and had been there since 2:30 PM. J.D. was transported to the homicide office for questioning.

After reading and signing the advice of rights, J.D. stated that on January 23<sup>rd</sup>, 2021, Childs III came over to her house to spend the night. While he was there he got a phone call from his dad telling him to come home. J.D. got him an Uber to go back to his house. J.D. stated that sometime between 2:00 am and 3:00 am in the morning on January 24<sup>th</sup>, Childs III drove back over to the house in a white Chrysler. J.D. had never seen Childs III drive this vehicle before. Childs III stated that his father had kicked him out. When he arrived back at her house, Childs III had two bags of clothes and some shoes with him.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

#### Affidavit for Probable Cause

From: Detective Christopher Winter

About 30 minutes after Childs III arrived back at J.D.'s home J.D. received an alert on her Citizens app that there had been a shooting on 36<sup>th</sup> street. Soon after there was another alert regarding a shooting on Adams Street. J.D. asked Childs III if he knew anything about the shooting and he said no. Later in the morning J.D. convinced Childs III to go to the crime scene after speaking with Childs III's sisters. She stated Childs III was nervous to go to the scene and when they got there, he began crying and "acted a clown." She had never seen him like this before. They then went back to her home until around 2:00 in the afternoon. Childs III then wanted to go to another residence and grabbed some clothes to take with him. When they left Childs III placed the clothes by his feet in J.D.'s car. When they got to where Childs III wanted to go, he took the clothes with him. Shortly after J.D. pulled off, she hit the brakes and saw a magazine clip fly forward on the passenger's floor board of her Impala.

Detective Winter obtained a search warrant for the white 2006 Chevy Impala. Upon execution of the search warrant, Crime Scene Specialist Schilde recovered an AK-style magazine wrapped in clothes on the front passenger side floorboard containing 30 rounds of 7.62 ammunition (pictured below).



Detective Sgt. Erik Forestal and Detective Marc Klonne received information about a possible location of Childs III. Detectives went to 106XX Wyatt Drive, Indianapolis, and found Childs III. This location is the home of relatives of Childs III. Childs III was taken into custody without incident, and was transported to the homicide office before being placed under arrest. During a search incident to arrest,

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

#### Affidavit for Probable Cause

From: Detective Christopher Winter

Officers found a black iPhone with a cracked screen and pictures on the back of the case. The phone was recovered as evidence.

Dr. Greg Schmunk with the Marion County Coroner's Office performed autopsies on Raymond Childs, Jr., Kezzie Childs, Elijah Childs, R.C., and Kiara Hawkins. The cause of death of Raymond Childs, Jr. was multiple gunshot wounds to the torso. The cause of death of Kezzie Childs was multiple gunshot wounds to the torso. The cause of death of Elijah Childs was a single gunshot wound to the head. The cause of death of R.C. was a single gunshot wound to the chest. The cause of death of Kiara Hawkins was a single gunshot wound to the head. Dr. Schmunk determined that the manner of death of each was homicide. An autopsy of Kiara Hawkins' unborn male fetus was also conducted. Dr. Schmunk ruled that he suffered from intrauterine fetal demise due to a gunshot wound to the mother's head. Dr. Schmunk observed that he had fully developed extremities and jaw. There was no evidence of external injury. Dr. Schmunk described the fetus as full term and near birth.

On January 25<sup>th</sup> Detective Winter and Detective Hurt returned to Riley Hospital to talk to X.C. again. X.C. told them that before the shooting his father had asked him to put some water in a bottle, so he went to the bathroom to fill it. At that point he heard two gunshots. His father got out of bed, ran to the stairs, and said "what was that?" He then heard his sister R.C. say "Raymond shot Elijah!" Another gunshot went off, and he heard his dad say "I'm sorry Raymond, I love you." Another six or seven gunshots went off. At this point X.C. was laying down in the laundry room. When the shooting stopped he ran out of the house and around a corner, and Childs III chased him. X.C. stopped and said, "here bro, I can give you this forty dollars, I won't say nothing, please don't kill me." At that point Childs III shot X.C. in the leg, and he fell. Childs III then shot him in the arm. X.C. didn't see which way Childs III went after that. About 30 seconds later X.C. ran to a neighbor's house and started banging on the door. X.C. remained there until the police arrived. X.C. only saw Childs III with the Draco gun when Childs III chased him down outside the house. He described the gun as "all black with a wooden grip."

On January 25, Detective Winter received a phone call from a person who stated his name was AV. AV. stated that he is a cousin to Raymond Childs, Jr. and Childs III. AV. lives in Anderson, Indiana, and upon learning about the shootings of his family members he came to Indianapolis to find out more information about what had happened. A.V. and his brother E.V. picked up Childs III. A.V. stated that when Childs III got in his vehicle they asked him what happened, and Childs III said that some people from the next block did it. When Childs III got into the truck, he was armed with a Draco firearm that A.V. recognized as belonging to Raymond Childs, Jr. A.V. told Childs III to give him the gun because A.V. had a permit to carry a firearm, and Childs III complied.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

# Affidavit for Probable Cause

From: Detective Christopher Winter

A.V. later contacted Anderson Police Department Detective Doug Stanton and turned the firearm over to him. On January 26<sup>th</sup>, 2021, Detective Winter retrieved the firearm from the Anderson Police Department (pictured below).



Anderson Police Department - Assist Other Agency IMPD Case# IP210008068

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT

#### **Affidavit for Probable Cause**

From: Detective Christopher Winter

The 9mm spent shell casings and 9mm handgun recovered from the home on Adams Street, along with the 7.62 spent shell casings found at both the home on Adams Street as well as the in the secondary crime scene on 36<sup>th</sup> street, and the 7.62x39mm caliber ROMARM (MINI DRACO) firearm recovered from Childs III by A.V. were submitted to the Marion County Crime Lab for comparison. Forensic Firearms Examiner Timothy Spears examined the submitted evidence. He determined that all of the fired 9mm cartridge casings were fired from the 9mm handgun located in the home. He also determined that all of the recovered 7.62 fired cartridge casings were fired from the 7.62x39mm caliber ROMARM (MINI DRACO) firearm taken from Childs III by A.V.

I swear (affirm), under penalty of perjury as specified by IC 35-44.1-2-1, that the foregoing representations are true.

/s/ Christopher Winter

AFFIANT