

STATE OF INDIANA )  
) SS:  
COUNTY OF WAYNE )

WAYNE SUPERIOR / CIRCUIT COURT Wayne County, Indiana  
CAUSE NO. 89\_\_-2501-PL-\_\_\_\_\_

ADAM BLANTON, )  
)  
*Plaintiff,* )

v. )

MICHAEL SHIPMAN, *individually* )  
*and in his official capacity as Wayne* )  
*County Prosecuting Attorney, and the* )  
OFFICE OF THE WAYNE COUNTY )  
PROSECUTING ATTORNEY, )  
*Defendants.* )

**JURY TRIAL DEMANDED**

**COMPLAINT FOR DECLARATORY JUDGMENT, INJUNCTIVE RELIEF,  
AND DAMAGES**

Plaintiff, Adam Blanton, by counsel, for his Complaint against Defendants, Michael Shipman (in his individual capacity and in his official capacity as the Wayne County Prosecuting Attorney) and the Office of Wayne County Prosecuting Attorney, alleges and states the following:

**INTRODUCTORY STATEMENT**

1. This action seeks to hold accountable a county prosecutor who has exceeded and abused his authority by unjustly branding a decorated assistant chief of police with a professional scarlet letter. By placing Adam Blanton on a so-called Brady/Giglio list — a designation reserved for officers deemed untrustworthy to testify in court — Michael Shipman and the Wayne County Prosecutor’s Office have not only tarnished Blanton’s reputation without due process, but also undermined the integrity of inter-agency cooperation. This baseless and retaliatory act, conducted without notice nor an opportunity to be heard, sends a chilling message to law enforcement officers who stand

up for truth and professionalism. Blanton brings this action to protect his rights and ensure that Brady/Giglio lists are not weaponized for personal or political gain.

### **THE PARTIES**

2. Plaintiff Adam Blanton is a resident of Centerville, Indiana, and has served as an Assistant Chief with the Richmond Police Department (“**RPD**”) since January 2024. As Assistant Chief, Blanton holds a high-ranking leadership role in RPD, overseeing departmental operations, policymaking, and public communications, also serving as RPD’s Public Information Officer (PIO). Blanton does not serve in any patrol or investigative functions with RPD. Blanton brings this action in his individual capacity to seek redress for the harm caused by Defendants’ actions.

3. Defendant Michael Shipman is a resident of Wayne County, Indiana, and is the elected Wayne County Prosecuting Attorney. He has held this position since 2005.

4. Defendant Office of the Wayne County Prosecuting Attorney (the “**WCPO**”) is the governmental entity responsible for prosecutorial functions within Wayne County, Indiana.

5. This matter stems from a decision by Defendants to put Blanton on WCPO’s “Brady/Giglio List” in retaliation for two public statements made by Blanton with which Defendants took issue.

### **JURISDICTION & VENUE**

6. Jurisdiction is proper in this Court pursuant to Trial Rules 4.4 and 4.6.

7. Venue is proper in this Court pursuant to Trial Rule 75(A).

## FACTUAL BACKGROUND COMMON TO ALL COUNTS

### *Background on Brady/Giglio Lists*

8. Brady/Giglio lists are an emerging attempt by some local prosecutors to comply with the holdings of *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972). While neither case mandates the maintenance of a list, they do require disclosure to the defense of material, exculpatory evidence (*Brady*) and information relevant for impeachment of government witnesses (*Giglio*). With no bright-line rule from the U.S. Supreme Court on precisely what type of impeachment information must be disclosed, prosecutors have begun reading the scope of potential Giglio material broadly to include any type of information that would marginally undermine a witness' credibility. Indeed, a training presentation from the International Association of Chiefs of Police describes Brady/Giglio material to include evidence that "mere[ly] casts doubt on the testimony of the prosecuting witness," or evidences a "history of untruthfulness." Bill Amato & Aaron Jones, *Brady/Giglio and Officer Integrity*, <https://www.theiacp.org/sites/default/files/Brady-Giglio.pdf>.

9. Placement of an officer on a Brady/Giglio list causes profound reputational and professional injury. This designation functions as a public declaration that the officer's credibility is irreparably compromised, effectively branding them a liar in the eyes of the justice system and the community. The consequences are severe and lasting: officers placed on such lists may be fired, disciplined, barred from filing cases, prohibited from testifying in court, and rendered unemployable in their chosen profession. For these reasons, Brady/Giglio lists are frequently described as "scarlet letters" for law enforcement officers—a mark that not only stigmatizes but also erases years of honorable

service and dedication, all without the safeguards of notice or an opportunity to defend themselves. *See generally* Jeffrey Steven McConnell Warren, *The Scarlet Letter: North Carolina, Giglio, and the Injury in Search of a Remedy*, 12 WAKE FOREST L. REV. ONLINE 24, 28 (2022) (“[P]rosecutors have transformed the *Giglio* decision – intended to be a shield for criminal defendants – into a sword, making prosecutors the ultimate arbiters of who can, or cannot, serve as a law enforcement officer in a particular state.”) The professional and reputational harms caused by an officer’s inclusion on a Brady/Giglio list are magnified when, as is the case here, the list becomes publicized.

10. WCPO prepared a memo detailing its Brady/Giglio policies, which were shared with Wayne County law enforcement on August 28, 2024. (**Exhibit 1**.) The memo states WCPO’s intent to maintain a list of law enforcement officers “who have had incidents of untruthfulness, criminal convictions, candor issues or some other type of issue placing their credibility into question.” The memo goes on to provide examples of issues covered by the Brady/Giglio process, including arrests, racial bias, falsifying evidence, findings of dishonesty and the like.

***The Dispute Begins:  
RPD Statement Regarding Fort Wayne Murders & YouTube Prankster***

11. On September 20, 2024, two bodies were recovered from the St. Mary’s River in Allen County, Indiana. Fort Wayne Police Department investigated their deaths as murders and filed charges against Dominique Washington under cause 02D05-2409-MR-000030. The decedents were residents of Wayne County and RPD was investigating their disappearance. The probable cause affidavit (“PCA”) filed in the case stated that Sgt. Dru McClain of RPD identified both victims as confidential informants for RPD.



12. On September 24, 2024, Blanton posted a statement on RPD's Facebook page calling the PCA's characterization of the Allen County Victims as informants "incorrect." (**Exhibit 2**.) The following day, again acting on behalf of RPD, Blanton issued a follow-up statement saying:

We cannot rule out that Dixon or Johnson, at some point in their lifetime, have worked covertly and cooperatively with the police department; however, regarding Dominique Washington, Chance Saylor, or James Atwell III, we can verify that both Johnson and Dixon were not working in any Informant capacity, in fact, from our preliminary investigation, Dominique and Johnson appeared to be acquaintances.

At this point in the investigation, we believe that relaying information about all involved individuals led to miscommunication and mistaken assumptions from an agency communicating by phone over 100 miles from Richmond as they completed their affidavit. It appears that during the conversation with FWPD, Sgt. McClain mentioned the potential involvement of Dixon and Johnson in a separate investigation to be as helpful as possible in finding the likely suspect in this case.

It is critical to point out that Probable Cause Affidavits sometimes contain miscommunications that must be later worked out through the judicial process. In this case, FWPD did a phenomenal job, from the discovery of the bodies to the arrest of Dominique Washington in less than three days, working over numerous counties and an enormous body of information. Probable Cause, from a legal standard, is merely that something is more likely than not to have happened, which is far less than the burden of proof that requires a conviction, which is guilt beyond a reasonable doubt or greater than 99%. We suspect that through due process, this issue will be rectified, and justice will be served.

I would be happy to clarify, but I cannot disclose every detail since this is a critical and ongoing investigation, and we do not intend to jeopardize the Fort Wayne Case. We've contacted news sources to inform them about this confusion. It is difficult to reach every organization that has run the story based on the PC affidavit to rectify this. We have commented on our Facebook page in an attempt to get anyone who may be willing to look.

I have attached Chief Kyle Weatherly and Assistant Chief Brandon Krofta so they can know about this interaction.

**(Exhibit 3.)**

13. On September 22, 2024 a local prankster, who posts videos of his pranks on YouTube, affixed a small platform to an electrical pole located in the City of Richmond, adjacent to a Red Lobster restaurant. After mounting the platform, he proceeded to duct tape himself the pole and film the ensuing police reaction. The officers on scene safely removed the prankster and released him with a trespass warning. The officers did not complete a police report and none was sent to WCPO.

14. There was some public clamor for charges against the prankster. One member of the public, a disabled individual with family ties to Richmond, reached out to Shipman on Facebook to ask why the prankster had not been charged. Shipman replied, saying:



**(Exhibit 4.)**

15. Shipman's insult of the citizen attracted negative news coverage. On October 2, 2024, the Richmond local newspaper the *Pal-Item* ran a story titled "Wayne

prosecutor calls citizen 'Cheeto eater' when asked why not prosecute prankster.”

**(Exhibit 5.)** The reporter sought comment from Blanton about the status of charges.

Blanton responded that he did not know whether WCPO would elect to file charges.<sup>1</sup>

16. The next day, October 3, 2024, Blanton emailed RPD Captain Kevin Smith. That email **(Exhibit 6)** reads:

The aforementioned call concerns Dawson S Roberts drilling a hole into an RPL pole and then taping himself to it. Officer John Knock is listed as the primary officer. The officers banned the subjects from Red Lobster but declined to take any enforcement action.

From reading the call, it appears that the males drilled a hold (sic) and then put a block into a telephone pole that belongs to the City. While this may not seem like much, a pole is over 4k to replace, which is mischief. Additionally, failing to send at least a report for such to the prosecutor's office for review is not a good look on the agency or the community. The prosecutor's office should be the ones to decline charges, not RPD. Discretion cannot be argued in this case because officer discretion would be an officer choosing not to arrest, which is what happened. A poor discretion choice is not following up with a case report and charges for prosecutorial review.

Please have Officer Knock complete a case on this and forward it to the prosecutor's office for their review. Please notify us when the officer has completed this.

17. When he responded to the reporter's question, Blanton assumed, wrongly, that the responding officer had sent a report on to the WCPO. In the October 3<sup>rd</sup> email, Blanton instructed the officer's supervisor to correct the oversight and complete RPD's case.

### ***The Brady/Giglio Letter***

18. On October 9, 2024, Shipman and the WCPO issued a letter putting Blanton on its Brady/Giglio list. **(Exhibit 7.)** The October 9<sup>th</sup> letter lists the Facebook

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<sup>1</sup> The *Pal-Item* story initially reported that Blanton said WCPO would not file charges. That reporting was inaccurate and Blanton successfully obtained a correction on his own initiative.

post regarding the Fort Wayne murders and the October 2<sup>nd</sup> *Pal-Item* article regarding the YouTube prankster as the reasons for Blanton's inclusion on the list. Notably, the October 9<sup>th</sup> letter does not accuse Blanton of dishonesty. As to the Fort Wayne Facebook post, the letter takes issues with Blanton's initial inaccurate statement but does not suggest that Blanton *knew* the Facebook post was inaccurate when he published it. Indeed, the letter acknowledges that Blanton tried to correct the original inaccuracy but concludes that that if "the information [Blanton] received was incorrect, he has a duty as PIO to verify accuracy before disseminating."

19. Likewise, the October 9<sup>th</sup> letter does not allege Blanton was dishonest with regard to his statement to the press relating to the YouTube prankster. Instead, the letter takes issue with RPD's subsequent decision to direct the responding officer to prepare a police report, coloring the effort as "an attempt to make our office review a case...for the purpose of appeasing the public and to align with Adam's first incorrect statement," rather than the simpler explanation that RPD thought its officer had committed an oversight.

20. The letter also takes issue with a minor contretemps involving Blanton's decision to share Shipman's phone number with a reporter.

21. On November 15, 2024, Defendants sent the Brady/Giglio list to all Wayne County law enforcement agencies. (**Exhibit 8.**) This move was gratuitous because Blanton is not an employee of any agencies other than RPD. Disclosure of Blanton's inclusion on the Brady/Giglio list had no relation to any pending or future WCPO cases, nor was it necessary for WCPO to perform its discovery obligations. Defendants sent the

Brady/Giglio list to the law enforcement agencies for no official reason and solely to embarrass Blanton.

22. Blanton's inclusion on the Brady/Giglio list has also been leaked to the press. See, e.g., Joe Schroeder, *Docs: Richmond Police Lied About Murder Victims Not Being Informants; Officer Put on Brady List*, Dec. 5, 2024, <https://fox59.com/indiana-news/docs-richmond-police-lied-about-murder-victims-not-being-informants-officer-put-on-brady-list/>; and Jeff Lane, *Richmond Assistant Police Chief Placed on 'Brady List' by Prosecutor*, Dec. 4, 2024, <https://kicks96.com/local-news/770942>. Shipman has personally disseminated the Brady/Giglio list on Facebook in online disputes with third parties. **(Exhibit 9.)**

#### ***Further Retaliation by Defendants***

23. Defendants' hostility toward Blanton continued to play out even after the Brady/Giglio letter. On November 12, 2024, Shipman sent a lengthy letter to RPD demanding an internal investigation into Blanton (and other officers) for allegedly accessing Call for Service 24-001584 (the "CFS"). **(Exhibit 10.)** The CFS related to an incident that occurred on January 8, 2024, in which a woman believed to be Shipman's girlfriend was pulled over by a Centerville Police Officer on suspicion of drunk driving. The CFS indicates that though the driver refused consent to a field sobriety test, she was released without further investigation or arrest. There has been public discussion of the incident in Richmond, with speculation being aired in legacy and social media that Shipman intervened on his girlfriend's behalf to avoid her arrest.

24. The internal investigation letter concedes there is no evidence Blanton accessed the CFS to be found in the CFS audit log. Despite this, the internal investigation

letter proceeds from the mistaken assumption that the parties accessing the CFS did so at Blanton's direction, in retaliation for Blanton's placement on the Brady/Giglio list.


25. Shipman's call for an internal investigation of Blanton was unrelated to his duties as the Wayne County Prosecutor and reflects his continued personal animus toward Blanton. The CFS is accessible by law enforcement in the course of their duties and plays no role in any active, or even potential, WCPO cases. Shipman's decision to take action against individuals who accessed the CFS was entirely personal and motivated by reputational concerns.

26. As part of his continuing animus toward Blanton and those associated with him, Shipman emailed Cambridge City Police Officer Dillon Pitcher and informed him that WCPO will no longer file any of Officer Pitcher's cases on account of his association with Blanton, saying:

Good morning Dillon:

I appreciate you speaking with me. I continue to have reservations about your association with Adam Blanton and accessing a CFS unrelated to your duties. The timing of that event troubles me. I must feel confident that an officer is not working against our office in order to pursue his or her cases. At this time, I am declining to file your cases.

Michael W. Shipman  
Prosecuting Attorney



**(Exhibit 11.)**

27. Shipman's email is further evidence of a single-minded, personal vendetta against Blanton and is troubling, as it shows a willingness to retaliate against an officer and decline prosecution of criminal cases solely on the basis of that officer's association with Blanton and a perceived lack of loyalty to Shipman. The Pitcher email is further evidence Defendants' ongoing use of the Brady/Giglio list is unrelated to legitimate WCPO work but, rather, is a cudgel used by them in an increasingly public spat with Blanton.

28. Shipman's request that RPD investigate Blanton has been leaked to the press. *See, e.g.,* Jeff Lane, *Prosecutor Drafts Formal Complaint Involving RPD, Cambridge City Officers*, Dec. 26, 2024, <https://kicks96.com/local-news/773776/prosecutor-drafts-formal-complaint-involving-rpd-cambridge-city-officers>.

**COUNT I – DEPRIVATION OF PROCEDURAL DUE PROCESS**

29. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

30. Blanton possesses a constitutionally protected liberty interest in his good name, reputation, and ability to pursue his chosen occupation in law enforcement.

31. Blanton also possesses a constitutionally protected property interest in his continued employment as Assistant Chief with the Richmond Police Department.

32. The Brady/Giglio designation is intended to ensure prosecutorial compliance with constitutional requirements to disclose material, exculpatory evidence in criminal proceedings. However, Defendants have weaponized this designation to

retaliate against and stigmatize Blanton without any connection to any specific criminal case or tangible evidence of dishonesty or malfeasance.

33. The inclusion of Blanton on the Brady/Giglio List, as designated by Shipman under color of law, combined with the public dissemination of this designation, constitutes a tangible alteration of Blanton's legal and professional status that significantly impairs his ability to serve as a law enforcement officer. Specifically:

- (a) the Brady/Giglio designation disqualifies Blanton from serving as a credible witness in criminal proceedings, a prerequisite for employment in most sworn law enforcement positions; and
- (b) the Brady/Giglio designation and its associated stigma constructively demote Blanton and effectively relegate him to a secondary class of law enforcement officers whose credibility and integrity are publicly questioned, damaging his ability to fulfill core duties and damaging his future career prospects.

34. Defendants have failed to implement or adhere to any process or procedural safeguards for inclusion on the Brady/Giglio List.

35. The stigmatization and tangible harm caused by Blanton's inclusion on the Brady/Giglio List were compounded by Defendant's public dissemination of this designation to other law enforcement agencies, the media, and the local community, ensuring widespread reputational damage without any opportunity for Blanton to respond or defend himself.

36. Defendants' actions under color of law deprived Blanton of procedural due process guaranteed under the Fourteenth Amendment to the United States Constitution.



**COUNT II – VIOLATION OF INDIANA DUE COURSE OF LAW CLAUSE**

37. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

38. Article 1, Section 12 of the Indiana Constitution guarantees that “every person, for injury done to him in his person, property, or reputation, shall have remedy by due course of law.”

39. Blanton possess a constitutionally protected liberty interest in his good name, reputation, and ability to pursue his chosen occupation in law enforcement under Article, Section 12 of the Indiana Constitution.

40. Defendants’ inclusion of Blanton on its Brady/Giglio List without procedural safeguards and dissemination of the List to local law enforcement agencies, the media, and the local community violates the due course of law guarantees of the Indiana Constitution.

**COUNT III – DECLARATORY JUDGMENT**

41. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

42. Blanton has standing to bring an action for declaratory relief pursuant to Indiana’s Uniform Declaratory Judgments Act (Indiana Code §§ 34-14-1 to -16) because an actual controversy exists between Plaintiff and Defendants regarding Blanton’s inclusion on the Brady/Giglio List maintained by the WCPO.

43. The Brady/Giglio designation is intended to ensure the disclosure of material evidence related to the credibility of law enforcement witnesses in criminal

proceedings. It is not designed as a retaliatory tool or a means to stigmatize law enforcement officers without proper justification or procedural safeguards.

44. The WCPO and Shipman, acting under color of state law, placed Blanton on the Brady/Giglio List without adequate evidence of dishonesty or misconduct relevant to criminal proceedings, and without providing notice or an opportunity to be heard.

45. Shipman's actions were arbitrary, capricious, and motivated by personal animus, as evidenced by:

- (a) the cited reasons for the designation, which involve minor factual inaccuracies unrelated to credibility or integrity;
- (b) the lack of established procedures for contesting or reviewing Brady/Giglio designations; and
- (c) the public dissemination of Blanton's inclusion on the List, which caused reputational and professional harm.

46. Defendants' systemic failure to implement or follow appropriate procedures for Brady/Giglio designations undermines the integrity of the process and creates an ongoing risk of harm to Blanton and other law enforcement officers.

47. Plaintiff seeks a judicial declaration that:

- (a) Defendants' inclusion of Blanton on the Brady/Giglio List was improper, unlawful, and in violation of Blanton's federal and state constitutional rights;
- (b) the WCPO failed to establish or follow appropriate procedures for designating individuals for the Brady/Giglio List;

(c) any publication of Blanton's inclusion on the Brady/Giglio List was unlawful and without justification; and

(d) Defendants are required to implement and follow procedural safeguards for any future Brady/Giglio designations, including providing notice and an opportunity to be heard.

48. A declaration by this Court will terminate the uncertainty and controversy between the parties, clarify the rights and obligations of the parties, prevent further harm to Plaintiff, and ensure that Defendants' actions comply with constitutional requirements.

**COUNT IV – ABUSE OF PROCESS**  
*Against Shipman individually*

49. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

50. Shipman intentionally used the Brady/Giglio List for purposes other than those for which it was designed.

51. The Brady/Giglio doctrine is intended to ensure the disclosure of material, exculpatory evidence that bears on the credibility of law enforcement witnesses in criminal proceedings. It is not intended to be used as a tool for personal retaliation or to punish officers for perceived slights or disagreements unrelated to their integrity as witnesses.

52. Shipman placed Blanton on the Brady/Giglio list without any evidence of dishonesty, malice, or misconduct relevant to Blanton's (potential) role as a witness in criminal proceedings. Instead, Shipman cited minor factual inaccuracies and actions unrelated to Blanton's credibility or trustworthiness.

53. Shipman's ulterior motive in misusing the Brady/Giglio List was personal and political retaliation or retribution against Blanton.

54. Shipman's willful misuse of the Brady/Giglio List included:

- (a) publicizing Blanton's placement on the List to law enforcement agencies and the media, thereby stigmatizing Blanton and undermining his professional reputation;
- (b) escalating inter-agency disputes by leveraging the Brady/Giglio List as a retaliatory measure rather than a legitimate legal tool; and
- (c) using the Brady/Giglio List to punish Blanton for perceived challenges to Shipman's authority, rather than to fulfill the doctrine's intended purpose of ensuring prosecutorial integrity.

55. As a direct and proximate result of Shipman's abuse of process, Blanton has suffered substantial reputational harm, professional damage, emotional distress, and loss of standing within the law enforcement community.

56. Blanton is entitled to compensatory damages for these injuries, as well as punitive damages to deter Shipman and others from engaging in similar conduct in the future.

**COUNT V – FALSE LIGHT INVASION OF PRIVACY**  
*Against Shipman individually*

57. Plaintiff incorporates the preceding paragraphs by reference as if fully set forth herein.

58. Shipman gave publicity to a matter concerning Blanton by placing him on the Brady/Giglio List and disseminating the designation to local law enforcement agencies, the media, and the local community.

59. The Brady/Giglio designation, as publicized by Shipman, falsely implied that Blanton was dishonest, unreliable, or otherwise unfit to perform his duties as a law enforcement officer, despite the absence of any evidence or finding of dishonesty or malfeasance.

60. The false light in which Shipman placed Blanton would be highly offensive to a reasonable person, as it stigmatizes Blanton in the eyes of his peers, the public, and prospective employers, creating the false impression that Blanton lacks integrity and credibility necessary for his role in law enforcement.

61. Shipman knew, or acted in reckless disregard of the falsity of the publicized matter and the false light in which Blanton would be placed. Specifically:

- (a) Shipman publicized the Brady/Giglio designation without sufficient investigation into its appropriateness or accuracy;
- (b) Shipman disseminated the designation with knowledge that it carried severe reputational harm disproportionate to the minor administrative or factual inaccuracies cited as justification; and
- (c) Shipman weaponized the designation as a retaliatory tool against Blanton, further disregarding the truth or appropriateness of the matter publicized.

62. As a direct and proximate result of Shipman's actions, Blanton has suffered significant reputational harm, emotional distress, and damage to his professional standing.

### REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:


- (a) **Declaratory Relief:** (i) declare that Defendants' actions in placing Blanton on the Brady/Giglio List and publicizing this designation violated Blanton's constitutional rights under the Fourteenth Amendment to the U.S. Constitution and Article 1, Section 12 of the Indiana Constitution; and (ii) declare that Defendants failed to implement or follow appropriate procedures for Brady/Giglio designations, rendering Blanton's inclusion on the list improper and unlawful;
- (b) **Injunctive Relief:** (i) issue injunctive relief requiring Defendants to remove Blanton from the Brady/Giglio List; (ii) enjoin Defendants from further publicizing Blanton's inclusion on the Brady/Giglio List or any related stigmatizing information; (iii) require Defendants to implement constitutionally compliant procedural safeguards for any future Brady/Giglio designations, including providing notice and a meaningful opportunity to be heard;
- (c) **Compensatory Damages:** award compensatory damages to Blanton in an amount sufficient to redress the harm caused by Defendant Shipman's actions, including reputational harm, emotional distress, damage to professional standing, and any other actual damages suffered;

- (d) **Punitive Damages:** award punitive damages against Defendant Shipman in his individual capacity in an amount sufficient to punish his wrongful conduct and deter similar misconduct in the future;
- (e) **Attorneys' Fees & Costs:** award Plaintiff reasonable attorneys' fees and costs incurred in bringing this action, pursuant to 42 U.S.C. § 1988 and applicable Indiana law; and
- (f) award all other relief just and proper relief.

**JURY DEMAND**

Plaintiff hereby requests a trial by jury on all issues so triable.

Respectfully submitted,



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*Attorneys for Plaintiff*  
*Adam Blanton*

TO: Law enforcement agencies working in Wayne County, Indiana

FROM: Mike Shipman

RE: Witness conduct implicating Brady/Giglio

DATE: August 28, 2024

I wanted to review material related to the cases of Brady and Giglio. Each law enforcement agency should have an internal process whereby issues relating to officer integrity are maintained and sent to our office. The following information should be contained in each law enforcement agency's SOPs. There should also be a procedure in place for sending that information to us.

#### Brady v. Maryland

- 1963 capital murder case
- Government had a duty to disclose material exculpatory evidence
- Failure to do so violated due process – where the evidence is material to either guilt, innocence of the accused or punishment
- There is no regard for good or bad faith of the prosecutor

Under the Constitution, due process requires the prosecution to turn over evidence favorable to the accused and material to his guilt or punishment. This requirement includes evidence that may be used to impeach the prosecution's witnesses, including police officers.

Police officers and police agencies are, for purposes of Brady, considered to be part of the prosecution team. They must therefore make the prosecutor aware of any evidence that may be favorable to the accused.

#### United States v Giglio

Brady rule includes evidence that could be used to impeach a witness.

#### Kyles v Whitley

Prosecutor has a duty to learn of any favorable evidence known to others acting on behalf of the government....this includes the police.

Impeachment and exculpatory evidence must be made known to the prosecutor assigned to the case.

Examples of impeachment and exculpatory evidence include:

- Government's obligation to disclose favorable evidence under Brady covers not only material exculpatory evidence but also information that could impeach government witnesses.



- Agreements exchanging testimony for money or favorable treatment.
- The fact the witness suffers from hallucinations.
- Efforts by one witness to improperly influence the testimony of other witnesses.
- History of untruthfulness
- Other conflicting statements made by witnesses.

#### Examples of material exculpatory evidence

- Prior inconsistent statements of key witnesses
- Government witnesses had previously filed a false report.
- Information undermining the credibility of witness identification of defendant.
- Doctor's report following an autopsy which conflicts with later trial testimony.

#### Untruthfulness

The term "untruthfulness" refers to false statements, false reports, or intentionally incomplete statements and reports.

False statements involve all aspects of the job, not just enforcement and criminal investigations. See Dreary v. Gloucester (ten-year-old disciplinary finding that an officer falsified overtime records admitted for impeachment purposes); United States v. Williams (new trial ordered because FBI failed to disclose that an agent who was a witness at trial had, fifteen years earlier, received a letter of reprimand for forging an informant's signature on a receipt and lying about the forgery under oath).

#### Bias

Bias includes prior records allegedly showing an officer's bias against an identifiable group. Bias could also be shown toward a particular person or family, based upon prior conduct or statements.

#### Crimes

Crimes committed by officers should be turned over to the prosecution.

#### Ultimate Use of the Information

Brady information must be disclosed to the prosecutor. The prosecutor must then decide whether to disclose the information to the defense. It is very possible, however, that the information may not be admissible in court. Only that evidence which the court finds to be relevant for impeachment purposes can be used.

What is a “Brady” or “Giglio” list?

A Giglio or Brady list is a list compiled by a prosecutor’s office and a police department containing names of law enforcement officers who have had incidents of untruthfulness, criminal convictions, candor issues, or some other type of issue placing their credibility into question.

Placement on the List

- Law enforcement agencies must disclose information regarding potential Brady/Giglio material to prosecutors. This should include the name of the officer, brief factual description of the incident, date of incident and internal discipline issued for the offense.
- Both the law enforcement agency and the prosecutor’s office should maintain the list of disclosures.
- Prosecutors will then review the disclosures and determine how to handle the information. If the violation by the officer implicates Brady or Giglio, it will be submitted to defense counsel.

The Wayne County Prosecuting Attorney requests the following from law enforcement agencies working in Wayne County, Indiana:

- Any criminal record of any witness, or any criminal case pending against any witness, involved in a law enforcement investigation submitted to our office for prosecution.
- Information known to the law enforcement agency which casts doubt on the credibility or accuracy of a witness or evidence.
- Information known to the law enforcement agency regarding any mental or physical impairment of any governmental witness that would cast doubt on his or her ability to testify accurately and truthfully at trial.
- A finding of misconduct that reflects on an officer’s truthfulness.
- Evidence that a proposed witness has a racial, religious, or personal bias against a defendant individually or as a member of a group.
- The following examples of misconduct have been documented in case law:
  - (i) lying to superiors during internal/administrative police investigations;
  - (ii) falsifying police reports or making misleading reports;
  - (iii) planting evidence;
  - (iv) theft of evidence in police custody;
  - (v) failed polygraphs;
  - (vi) inappropriate records checks of detainees or witnesses;
  - (vii) any history of lying in the process of testifying or preparing affidavits under oath

The Bottom Line

- The law enforcement agency should make sure the prosecutor is aware of any information about the officer that, if revealed, would be favorable to the defense.
- The law enforcement agency must disclose to the prosecutor anything in the officer's background that reflects bias, untruthfulness or criminal activity.
- The responsibility to disclose the information to the defense belongs to the prosecutor. You do not want the agency/officer to be held responsible for the retrial of a case due to non-disclosure to the prosecutor.
- All of this applies to both felony and misdemeanor cases.





Sep 24, 2024 · 🌐

**PRESS RELEASE**

**FOR IMMEDIATE RELEASE**

**September 24, 2024**

**Contact:**

**Assistant Chief Adam Blanton, Public Information Officer**

**Richmond Police Department Assists in Multi-Agency Investigation Leading to Double Homicide Arrest**

On Monday, September 23, 2024, the Richmond Police Department (RPD), in collaboration with the Fort Wayne Police Department, Indiana State Police, and federal partners, played a crucial role in a significant investigation that resulted in the arrest of a suspect tied to a double homicide in Fort Wayne, Indiana.

The bodies of Christina Dixon, 41, and Matthew Johnson, 41, both of Connersville, Indiana, were recovered from the St. Mary's River, just east of the Guldlin Park Boat Ramp in Fort Wayne. A thorough investigation identified Dominique M. Washington, 29, of Richmond, as a suspect wanted for Level 1 felony charges of Murder and Kidnapping.

At approximately 9:30 p.m. on Monday, Indiana State Police SWAT, the Fort Wayne Police Department, and the Richmond Police Department executed a search warrant at 420 Campbell Avenue in Richmond. Washington was taken into custody during a traffic stop as he departed his residence before the search warrant was executed. He was arrested without incident and remanded to the Allen County Jail.

**Richmond Police Chief Kyle Weatherly emphasized the Department's commitment to seeking justice for the victims:**

*"Our hearts go out to the families of Christina and Matthew as they endure this tragic loss. We remain steadfast in our commitment to bringing justice to them. This arrest is just one step in ensuring that those responsible for such horrific acts are held accountable. We will continue to work tirelessly alongside our partners to ensure that justice is served. Additional arrests and information will follow, and we will not rest until everyone involved is brought to justice."*

The Richmond Police Department works closely with the Fort Wayne Police Department, Indiana State Police, and federal agencies. This multi-agency effort underscores the strength of collaboration in solving complex cases. Investigators anticipate that additional arrests will be made as the investigation progresses.

***As a reminder, all individuals are presumed innocent until proven guilty in a court of law.***



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Author

**Richmond Police Department**

The Richmond Police Department has been made aware of several reports from Fort Wayne news agencies claiming that the two decedents were informants for the Richmond Police Department. This information is incorrect.

The Richmond Police Department works closely with individuals who cooperate in investigations, handling each case with the utmost respect for their safety and ensuring adherence to all legal protections. We take these responsibilities seriously and prioritize the security and well-being of anyone assisting in the pursuit of justice.

14w Like Reply

21



Jenni Blair replied · 8 replies





Adam Blanton [REDACTED]

---

**WTHR Request**

---

Adam Blanton [REDACTED]

Wed, Sep 25, 2024 at 7:15 AM

To: "Cannelongo, Phil" [REDACTED]

Cc: "WTHR.Newsdesk" [REDACTED], Brandon Krofta [REDACTED], Kyle Weatherly [REDACTED]

We are actively investigating how this information entered the probable cause affidavit for the Fort Wayne Police Department. We contacted them to alert them of this confusion and expanded on this during an interview with a Fort Wayne News Affiliate.

We cannot rule out that Dixon or Johnson, at some point in their lifetime, have worked covertly and cooperatively with the police department; however, regarding Dominique Washington, Chance Saylor, or James Atwell III, we can verify that both Johnson and Dixon were not working in any Informant capacity, in fact, from our preliminary investigation, Dominique and Johnson appeared to be acquaintances.

At this point in the investigation, we believe that relaying information about all involved individuals led to miscommunication and mistaken assumptions from an agency communicating by phone over 100 miles from Richmond as they completed their affidavit. It appears that during the conversation with FWPD, Sgt. McClain mentioned the potential involvement of Dixon and Johnson in a separate investigation to be as helpful as possible in finding the likely suspect in this case.

It is critical to point out that Probable Cause Affidavits sometimes contain miscommunications that must be later worked out through the judicial process. In this case, FWPD did a phenomenal job, from the discovery of the bodies to the arrest of Dominique Washington in less than three days, working over numerous counties and an enormous body of information. Probable Cause, from a legal standard, is merely that something is more likely than not to have happened, which is far less than the burden of proof that requires a conviction, which is guilt beyond a reasonable doubt or greater than 99%. We suspect that through due process, this issue will be rectified, and justice will be served.

I would be happy to clarify, but I cannot disclose every detail since this is a critical and ongoing investigation, and we do not intend to jeopardize the Fort Wayne Case. We've contacted news sources to inform them about this confusion. It is difficult to reach every organization that has run the story based on the PC affidavit to rectify this. We have commented on our Facebook page in an attempt to get anyone who may be willing to look.

I have attached Chief Kyle Weatherly and Assistant Chief Brandon Krofta so they can know about this interaction.

Respectfully,

-AB

**A. Blanton**  
*Assistant Chief of Police & PIO*  
*Richmond Police Department*

[REDACTED]

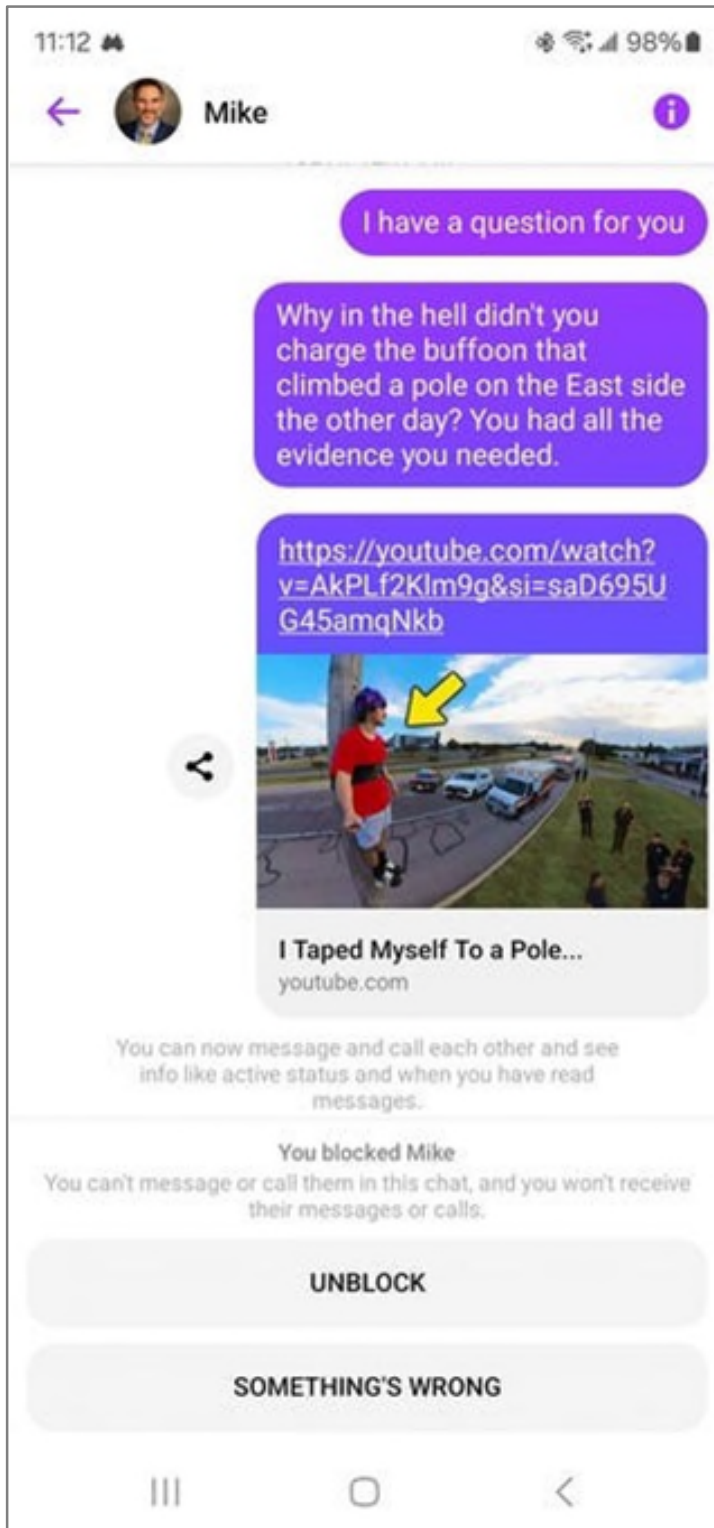


***"A problem well stated is a problem half-solved".***

***Charles Kettering***

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[Quoted text hidden]



## LOCAL

# Wayne prosecutor calls citizen 'Cheeto eater' when asked why not prosecute prankster

**Evan Weaver**

Richmond Palladium-Item

Published 10:24 a.m. ET Oct. 2, 2024 | Updated 10:40 a.m. ET Oct. 3, 2024

*This story was updated to add new information.*

RICHMOND, Ind. — The Wayne County prosecutor, when questioned about an apparent decision to not file criminal charges against a recent YouTube prankster who duct-taped himself to a telephone pole along U.S. 40, allegedly responded angrily and called the critic a "Cheeto eater."

Dawson, whose last name is unknown, also known as "dawszn" on YouTube, posted a video on Sept. 22 showing that he allegedly duct-taped himself to a telephone pole outside of Red Lobster on U.S. 40 the day before.

What followed was a response from the Richmond police and fire departments who were able to retrieve him, before RPD detained him and put in the back of a squad car. While in the squad car, Dawson live streamed on Instagram, before officers let him go with a trespass ban from the property along with a warning for disorderly conduct.

Adam Blanton, assistant chief for the Richmond Police Department, said he was not sure if the prosecutor's office will elect to charge him.

When asked by Facebook user Christopher Shawn Durham why he didn't pursue charges, Wayne County Prosecutor Mike Shipman allegedly responded: "Hey Cheeto eater, go to college for 7 years, get elected prosecutor and then you can make the decision. Otherwise shut the hell up because your opinion does not matter."

Durham, who has cerebral palsy, grew up in Cambridge City but has lived in Akron, Ohio, for 20 years because of medical reasons. He said he keeps in contact with friends and family still living in Wayne County every day to know what's going on.

Shipman did not respond to multiple requests for comment this week.

*Evan Weaver is a news and sports reporter at The Palladium-Item. Contact him on X (@evan\_weaver7) or email [ateweaver@gannett.com](mailto:ateweaver@gannett.com).*





Adam Blanton [REDACTED]

**CFS24-060214**

1 message

**Adam Blanton** [REDACTED]

Thu, Oct 3, 2024 at 10:16 AM

To: Kevin Smith [REDACTED]

Cc: Brandon Krofta [REDACTED], Kyle Weatherly [REDACTED]

Captain Smith,

The aforementioned call concerns Dawson S Roberts drilling a hole into an RPL pole and then taping himself to it. Officer John Knock is listed as the primary officer. The officers banned the subjects from Red Lobster but declined to take any enforcement action.

From reading the call, it appears that the males drilled a hold and then put a block into a telephone pole that belongs to the City. While this may not seem like much, a pole is over 4k to replace, which is mischief. Additionally, failing to send at least a report for such to the prosecutor's office for review is not a good look on the agency or the community. The prosecutor's office should be the ones to decline charges, not RPD. Discretion cannot be argued in this case because officer discretion would be an officer choosing not to arrest, which is what happened. A poor discretion choice is not following up with a case report and charges for prosecutorial review.

Please have Officer Knock complete a case on this and forward it to the prosecutor's office for their review. Please notify us when the officer has completed this.

-AB

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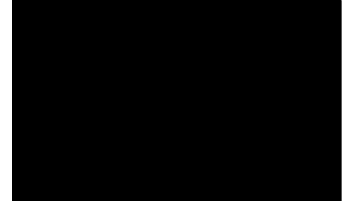
**A. Blanton***Assistant Chief of Police & PIO**Richmond Police Department**"A problem well stated is a problem half-solved".**Charles Kettering*

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**Office of the Prosecuting Attorney**  
**Wayne County, Indiana**  
**17<sup>th</sup> Indiana Judicial Circuit**

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Michael W. Shipman  
Prosecuting Attorney



October 9, 2024

Chief Kyle Weatherly  
Richmond Police Department



Dear Kyle:

Please be advised that the following officer is being placed on the Brady-Giglio list maintained by the Wayne County Prosecutor's Office.

Assistant Chief of Police and Public Information Officer (PIO), Adam Blanton

1. **Confidential Informants** – Statement released by Adam on RPD Facebook page on September 24, 2024, stating, “The Richmond Police Department has been made aware of several reports from Fort Wayne news agencies claiming that the two decedents were informants for the Richmond Police Department. This information is incorrect.”

On September 25, 2024, he then issued a follow up statement to a media outlet via email that read, in part, “We are actively investigating how this information entered the probable cause affidavit for the Fort Wayne Police Department. We contacted them to alert them of this confusion and expanded on this during an interview with a Fort Wayne News Affiliate. We cannot rule out that Dixon or Johnson, at some point in their lifetime, have worked covertly and cooperatively with the police department; however, regarding Dominique Washington, Chance Saylor, or James Atwell III, we can verify that both Johnson and Dixon were not working in any Informant capacity, in fact, from our preliminary investigation, Dominique and Johnson appeared to be acquaintances. At this point in the investigation, we believe that relaying information about all involved individuals led to miscommunication and mistaken assumptions from an agency communicating by phone over 100 miles from Richmond as they completed their affidavit. It appears that during the conversation with FWPD, Sgt. McClain mentioned the potential involvement of Dixon and Johnson in a separate investigation to be as helpful as possible in finding the likely suspect in this case.”

Adam first made a blanket statement that these individuals were not informants for RPD (which is factually inaccurate and he had the ability to verify this at the time). Both gave information to RPD that was used in a search warrant. I also approved Christina Dixon to purchase drugs as a CI in an email to Officer Huskisson on July 24, 2024. I declined to approve Johnson as a CI to buy drugs in that email.

Adam then tried to correct it by saying they may have been informants at some point but were not as it related to the specific individuals listed. I asked Ashley to contact Adam about the statements. During conversations between Ashley and Adam about the issue, he first stated another officer gave him incorrect information. Assuming the information he received was incorrect, he has a duty as PIO to verify accuracy before disseminating. He then shifted to state he meant it as to specific individuals.

- 2. Palladium Item Article** – On October 2, 2024, at 10:24 A.M., an article was posted by reporter Evan Weaver about the YouTube prankster situation. The article stated, “Adam Blanton, assistant chief for Richmond Police Department, said that the prosecutor’s office did not elect to pick up any charges on him allowing Dawson to be ‘sent on his way.’”

On October 2, 2024, at 1:43 P.M., Ashley called Adam’s cell phone and left a voicemail, asking him to her about the situation. Ashley was attempting to locate the case submitted to us. He didn’t return Ashley’s call. I also texted and called Adam without receiving a response. Ashley then located the Call for Service for the incident and learned RPD officers did not draw a case report number or write a report, so no report had been sent to our office to review charges. The statement in the Pal Item was also inaccurate, because prosecutors don’t elect to pick up charges BEFORE law enforcement makes an arrest or sends a warrant request for review. Neither of those things happened in this case.

On October 3, 2024, at 11:05 A.M., Ashley again tried to call Adam’s cell phone and was sent to voicemail after one ring. Ashley then called Chief Kyle Weatherly and explained her concerns. Approximately five minutes later, Kyle called back with Adam on speakerphone. Adam claimed that’s not what he said to Pal Item Reporter Evan Weaver and he (Adam) had contacted Weaver to correct it. Ashley asked Adam to send her the statement he did make so we could verify it, and Adam informed her it was not in writing, it was given verbally. Ashley informed him that was a bad practice because it gave him no proof as to what he actually said.

After the phone call, Ashley did see the Pal Item article was updated on October 3, 2024, at 10:40 A.M. to say, “Adam Blanton, assistant chief for the Richmond Police Department, said he was not sure if the prosecutor’s office will elect to charge him.”

On October 7, 2024, a case number for the YouTube prankster incident is present in the reporting system and an officer wrote a report and submitted a warrant request to our office to review the charge of Criminal Mischief (over two weeks after the incident...for putting two screw holes in a light pole). This appears to be an attempt to make our office review a case (that officers on scene didn’t even feel warranted a report to be written at

the time) for the purpose of appeasing the public and to align with Adam's first incorrect statement.

The other concerning part about the October 3 phone conversation with Adam and Kyle was when I asked Adam not to distribute my personal cell phone number to reporters. Adam responded that he didn't give out my number. I then told Adam I had a voicemail message from Evan Weaver stating he (Evan) received my number from Adam. Adam's response was then something to the effect of "he said he already had it." This seemed to indicate Adam did in fact give my number to Evan, but it didn't matter because he already had it.

The following is a transcript I created from my voicemail message: "Hi Mike, this is Evan Weaver with the Palladium Item. I got your number from Adam Blanton and just wanted to give you a call to just try and get some information from that YouTube prankster who tied himself to the pole. Just try and get information in regards to a story I'm working on. If you can just give me a call back my number is 260-564-0196. Thanks and I hope to talk to you soon. Looking forward to working with you, bye. ..."

Adam is welcome to submit a written response that will accompany this letter.

Sincerely,



Michael W. Shipman  
Prosecuting Attorney

MWS

---

**From:** Michael Shipman [REDACTED]  
**Sent:** Friday, November 15, 2024 10:34 AM  
**To:** 'Randy Retter -' [REDACTED]; 'Ed Buchholz -' [REDACTED]; 'Jeff Cappa -' [REDACTED]; 'Rick Bush -' [REDACTED]; 'Keith Folkner -' [REDACTED]; 'Scott Jarvis -' [REDACTED]; 'Todd Barker -' [REDACTED]; 'Jeff Light -' [REDACTED] >  
**Cc:** 'Ashley Green' [REDACTED]; 'Jerry Ragland' [REDACTED]  
**Subject:** Brady-Giglio

To agency heads or supervising officers:

I have received concerns by law enforcement officers regarding a few officers being placed on the Brady-Giglio list. Most of the officers on the list are from RPD and the Wayne County Drug Task Force. I understand that RPD Chief Kyle Weatherly is contacting other agencies about this issue. This email is meant to provide factual background about what has occurred. Rumors and inaccurate versions of events are not helpful to relations between our office and law enforcement agencies. I have attached two letters explaining why I took the actions that I did so there is context to what Chief Weatherly is claiming. I normally would not share this information with outside agencies. But I think it is important to do so to ensure our agencies work together on cases.

In the Dewey Olinger case, Judge Horn suppressed evidence gathered by the drug task force and the case had to be dismissed. Judge Horn specifically wrote in his ruling that "...it was reckless disregard of the truth if not direct falsehoods to, as part of the Affidavits, fail to disclose the above insufficiencies of the controlled buy, and then, setting to one side the insufficiencies which show a disregard of the truth if not direct falsehoods, the Affidavit's remaining content is insufficient to establish probable cause..." See Judge Horn's order in 89D02-2104-F2-000007 issued around July 30, 2024. It is a public record that anyone can access.

As you can read in my October 9<sup>th</sup>, 2024, letter to Chief Weatherly, my position was actually supportive of officers and I respectfully disagreed with Judge Horn's opinion. It is certainly contrary to the idea espoused by some officers that I am working against them. Prosecutors and judges sometimes disagree and see evidence differently based upon perspective. Despite my disagreement with Judge Horn's conclusion, I respect that he put considerable thought into his decision. I know that reasonable people can disagree. Based upon this order, I felt obligated to place the officers on the list as required by my ethical and legal obligations. It is not a decision that I wanted to make. But I am not permitted to stick my head in the sand and pretend like the order

was not issued. Being the prosecutor involves tough decisions that sometimes upsets people and officers.

On October 9<sup>th</sup>, 2024, I sent a letter to Chief Weatherly explaining that Adam Blanton was being placed on the Brady-Giglio list. I outlined my reasons in the letter. That letter is attached. Instead of acknowledging those errors cited in the letter and taking responsibility to do better, RPD administration has taken the position that I am out to get officers.

After I sent the letter, Adam attempted to do multiple things to retaliate against me. Unfortunately for him, he did none of those things well or effectively. He told Pal-Item reporter Evan Weaver that he was going to file an injunction against our office and a disciplinary complaint against me with the Indiana Supreme Court. Adam also told the reporter that he wanted to coordinate filing both of those actions on the same date the article appeared in the paper. He was seeking publicity. If he was truly interested in pursuing those issues, there was no need to reach out to the press.

After learning much of this information from reporter Evan Weaver, I had a discussion with city attorney AJ Sickmann. I explained that both the injunction and disciplinary action had no legal merit. The following day, AJ called to tell me he was not pursuing the injunction.

Adam also provided the reporter with information about an incident involving my girlfriend which occurred ten (10) months ago. He also did this for the purpose of retaliating against me. I have sent Chief Weatherly a complaint about this incident and request for an internal investigation. I believe it was inappropriate and a violation of RPD's operating procedures to use his position to attempt to embarrass me. I asked Chief Weatherly to appoint an outside investigator to look at my complaint. I think it is inappropriate to have my complaint investigated by James Doll, who is then supervised by Adam and Chief Weatherley.

I sent out a memo to law enforcement agencies about responsibilities under Brady-Giglio several months ago. All of your SOPs contain (or should contain) similar information that I sent out. The basis of my memo was a document from the International Association of Chiefs of Police. I have not heard from any agencies that they have a Brady-Giglio list. Therefore, I conclude that all agencies have conducted a Brady-Giglio review in compliance with their operating procedures and no such information exists. As a reminder, this may include internal discipline matters. If asked by defense counsel, I will share with them that agency reviews have been conducted and no potentially exculpatory evidence exists.

Some officers may be asking why the Brady-Giglio issue has arisen lately. Some are attributing a change in policy from our office in this regard. First, Brady-Giglio obligations have existed for decades. It is not new law. Most law enforcement agencies do not create the list or seek exculpatory information because of tension it can create between administration and line officers. It also has the potential to make an agency look bad to the public. There is no compelling reason to create the list because the public will rarely know about internal discipline matters. Violations of Brady-Giglio come to light because good attorneys know how to obtain the information.

But in our situation, three things occurred which renewed my focus on the issue. The first was the death penalty prosecution of Phillip Lee. The attorney for Lee dug into personnel files of the officers involved. While most defense attorneys do not dig that deep, it can be done in every criminal case. Our obligation to turn over potentially exculpatory evidence is not limited to serious cases. The second reason Brady-Giglio has come under renewed focus is the Olinger case. I cannot remember a judge ever using such strong language about officers' actions as was used in that case. To me, the Judge's conclusions made it obvious that Brady-Giglio was applicable. Finally, one of our deputy prosecutors attended a prosecutors' training session and Brady-Giglio was discussed in depth. I decided to ensure our policies complied with these legal obligations per this training.

You may convey this information to your officers in the manner you see fit. I want to emphasize that officers are not being targeted by me or this office.

Thank you,

**Michael W. Shipman**

Prosecuting Attorney

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Recently, Jeff Lane of Kicks 96 and 101.7 The Point shared a story drawing comparisons between my actions and those of Prosecutor Shipman in a separate case involving a traffic stop with his girlfriend, Dr. Catherine Marsteller. While public discourse and accountability are essential, these comparisons are misleading and fail to address key facts.

First, let's be clear: I was pulled over as millions of Americans are each year. There was no indication of impairment, and my position as a public official had no influence on the outcome. The Richmond Police Department treated me professionally and appropriately, and I was sent on my way. In the interest of transparency, I have requested that the Richmond Police Department release any body camera footage from this incident in accordance with their policies.

This situation is fundamentally different from the case involving Dr. Marsteller, which reportedly involved implied consent laws. While I won't speculate on that incident, the lack of released body camera footage from the Centerville Police Department and Wayne County Sheriff's Office raises questions. Transparency in both cases is crucial for public trust, and I encourage these agencies to release any relevant footage to let the facts speak for themselves.

Jeff Lane's role as a journalist is critical in holding public figures accountable, but with that comes the responsibility to report accurately and fairly. Lane has claimed to have filed a public records request for body camera footage related to my traffic stop, yet publicly denied making such a request. This inconsistency is troubling and warrants clarification. If journalists are to serve the public effectively, their reporting must be factual, unbiased, and thorough.

I look forward to seeing the same tenacity and investigative rigor from Jeff Lane in reporting on the Prosecutor's case. The community deserves to see fair and balanced scrutiny applied across the board, without selective emphasis or oversight.

Our community deserves transparency and fairness—not selective scrutiny or unsubstantiated comparisons. This isn't about avoiding accountability; it's about ensuring that the same standards apply to everyone, from public officials to members of the media.


As a community, we have an opportunity to move forward by demanding fairness, accuracy, and action. Let's hold ourselves—and each other—to the standards that will help us build a stronger, more unified future.


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 **Bobby Newton**  
Moral of these story's kids...don't drink and drive if ur husband is in power of authority in Wayne County..

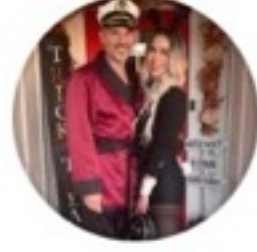
1w Like Reply 1 

 **Papash Awnp** replied · 1 reply

 **Papash Awnp**  
Didn't [Anne Taylor City Council Richmond, In](#) call her husband, the chief of RPD?  
Details of the stops haven't been released?! If there are details floating around, who released confidential details?  
  
Does it seem odd that the wife of chief of the police, is attacking someone who the chief of police, is in disagreement with? The chief has made public statements about disagreeing with the Brady list!  
  
Now the Brady list...isn't that in place to ensure the rights of citizens are upheld?? Doesn't that very list actually make a prosecutors' job more difficult?

1w Like Reply 1 

 **Papash Awnp** replied · 1 reply

 **Mike Shipman**  
<https://acrobat.adobe.com/id/urn:aaid:sc:US:b52c1e5a-50c8-4ade-9fc4-2516b5ce95a8>

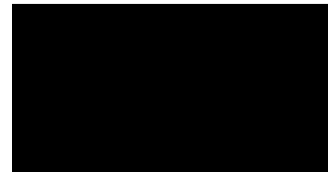
1w Like Reply



**Office of the Prosecuting Attorney**  
**Wayne County, Indiana**  
**17<sup>th</sup> Indiana Judicial Circuit**

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Michael W. Shipman  
Prosecuting Attorney



November 12, 2024

Chief Kyle Weatherly, RPD  
Via email

RE: Complaint and Request for Professional Standard Investigation

Dear Chief Weatherly:

I am requesting an internal investigation pursuant to the Richmond Police Department Policy Manual (hereinafter "Manual"). I believe Captain Doll is the commander of that department. A copy of this complaint has been forwarded to him.

The following policy indicates that if my complaint is assigned to your typical internal investigator, he would be investigating his bosses. Asking your "Professional Standards Division Commander" (Captain James Doll) to investigate these matters creates a conflict of interest and is similar to the "fox guarding the hen house."

200.6 PROFESSIONAL STANDARDS

The Chief of Police shall delegate a Professional Standards Division Commander. The Professional Standards Division Commander shall be appointed by and directly responsible to, the Chief of Police or the authorized designee. The Professional Standards Division Commander who's primary responsibility is to provide general management, direction, and control for the Professional Standards of the department.

The Professional Standards Commander oversees police conduct, ensures compliance with policies, procedures, and ethics, investigates complaints, and manages policy review and implementation. They maintain integrity, build community trust, and uphold professionalism within the department.

RPD Policy Manual, Organizational Structure and Responsibility, 200.6 Professional Standards, page 23

I am requesting that you exercise your discretion and appoint an independent, outside investigator to review this complaint. Doing so would give the community confidence in the result. My experience

has been that the Indiana State Police is highly qualified to conduct these investigations as they have experience with similar matters around the state. They will also appoint an investigator from another part of the state who has no affiliation with RPD or my office.

I am also requesting that you preserve any cell phone data on RPD issued mobile phones or personal computing devices for Mr. Blanton and Mr. Krofta. As you know, investigators can access that information, if needed, to determine which individuals communicated at specific times and what was said in those communications.

## I. FACTS

On October 9, 2024, I drafted a letter to you regarding the actions of Assistant Chief of Police and Public Information Officer (PIO) Adam Blanton. The letter contained my conclusions about Mr. Blanton's inappropriate conduct. Pursuant to my legal and ethical obligations, Mr. Blanton was placed on a "Brady-Giglio" list maintained by the Wayne County Prosecutor's Office. RPD also has a policy on Brady-Giglio found at Manual, Brady Information, 600, pgs. 434-36. The letter was mailed to RPD on October 10, 2024, from the Wayne County Prosecutor's Office.

On October 25, 2024, at 2:04 p.m. while working in his official capacity as an employee of the Richmond Police Department, Assistant Chief Brandon Krofta accessed Call for Service (CFS) 24-001584 from Wayne County EOC. Mr. Krofta accessed this record on his work computer RPDMDTKRO. (See attached "Wayne County Emergency Communication Audit Trail" which is attached hereto.) Mr. Krofta shares office space with Mr. Blanton at the Richmond Police Department.

Mr. Krofta then accessed the same CFS at 2:07 pm and 2:11 pm. Six (6) minutes later, at 2:17 pm, Cambridge City Police Officer Dillon Pitcher accessed the same CFS from the Cambridge City Police Department using his work computer, CCCITYPDCAM.

It is well known that Mr. Krofta, Mr. Blanton, and Mr. Pitcher are close friends.

CFS 24-001584 documented an incident that occurred on January 8, 2024. Officers Krofta, Blanton and Pitcher were not working for the agency that generated CFS 24-001584. There was no professional or job-related reason to access that call for service. Neither RPD nor Cambridge City Police Department had any involvement in that incident. Both Krofta and Pitcher used their work computers, while on duty for each respective agency, to access information unrelated to their professional responsibilities of each agency.

Mr. Blanton spoke with Palladium-Item reporter Evan Weaver. Mr. Blanton told Mr. Weaver that he was filing a disciplinary complaint and litigation against me. Mr. Blanton also provided information about CFS 24-001584 to Mr. Weaver so he (Mr. Weaver) could submit a public records request to EOC. It is my belief that Mr. Blanton did this so that it appeared as if Mr. Weaver obtained the information without his assistance. I note that although a CFS is a public document, the number associated with the specific call is not commonly known by the public, including a reporter. To request that specific document, I believe that Mr. Weaver was given that CFS number by Mr. Blanton. Mr. Blanton was acting in his official capacity as the public information officer of RPD when he provided this information to Mr. Weaver. Mr. Blanton also provided this

information for the purpose of retaliating against me for my lawful and appropriate conduct of placing him on the Brady-Giglio list.

On October 31, 2024, around 12:25 pm, Mr. Weaver made a public records request to EOC for CFS24-001584 and the Wayne County Prosecutor's Brady-Giglio list. (See attached "Request for Public Records" signed by Evan Weaver)

After Mr. Weaver left EOC on the afternoon of October 31, 2024, he appeared at the Wayne County Prosecutor's Office. Ashley Green, Chief Deputy Prosecutor, and I spoke with Mr. Weaver. Mr. Weaver stated he was writing an article based upon a conversation he had with Mr. Blanton. Mr. Weaver stated that Mr. Blanton intended to pursue litigation against me regarding being placed on the Brady-Giglio list. He also stated that Mr. Blanton was reporting me to the Indiana Disciplinary Commission for unethical behavior. According to Mr. Weaver, Mr. Blanton had even discussed the timing of when his article should be published so that it corresponded to the filing of the disciplinary complaint and litigation.

I told Mr. Weaver that I could not respond in any meaningful way because Mr. Blanton did not provide the information to me. I also told him that it was apparent that Mr. Blanton was using Mr. Weaver as a reporter to retaliate against me for placing him on the Brady-Giglio list. I told Mr. Weaver it was inappropriate for Mr. Blanton to attempt to coordinate release of the article at the same time as he submitted his litigation and disciplinary complaint to third parties. It also demonstrated his motive was to attempt to harm my reputation. Otherwise, he could have simply filed the disciplinary complaint and litigation without seeking news coverage of it.

I also told Mr. Weaver there was no legal merit to either litigation or the disciplinary complaint that Mr. Blanton was seeking. There is no published Indiana law that prohibits a prosecutor from placing officers on the Brady-Giglio list. In fact, the opposite is true. Our courts and legal precedent mandate that prosecutors take the position I did regarding Mr. Blanton's conduct.

During the afternoon of October 31, 2024, AJ Sickmann, attorney for the City of Richmond, called and left a message asking to speak with me. I called him back. Mr. Sickmann told me that Mr. Blanton was seeking an injunction against me to remove him from the Brady-Giglio list. I told Mr. Sickmann that Mr. Blanton's position has no legal support. I asked Mr. Sickmann if he knew of any Indiana legal authority that prohibited a prosecutor from using discretion to place an officer on the list. Mr. Sickmann was not aware of any legal authority, but his research was not exhaustive on the issue.

The following day, November 1, 2024, Mr. Sickmann called me to say that he was not filing the injunction requested by Mr. Blanton.

As of today, November 12, 2024, I have not received any disciplinary complaint from Mr. Blanton. He has not shared it with me so that I could respond. Nor have I been notified that the Indiana Disciplinary Commission has agreed to investigate his complaint (assuming it was even filed).

On November 6, 2024, I instructed attorneys in my office to seek a meeting with Mr. Dillon Pitcher of the Cambridge City Police Department and Assistant Chief Brandon Krofta. I instructed the attorneys to discuss two pending criminal cases with them (Turner in Sup .2 and Maciejewski in Sup 3). While we did discuss those cases, I also wanted to ask Mr. Pitcher and Mr. Krofta about whether

they assisted Mr. Blanton in gathering or distributing information about CFS24-001584 to the media. As mentioned previously, both are close personal friends and professional colleagues to Mr. Blanton. Both also accessed CFS24-001584 after my Brady-Giglio letter was sent to you, and before Mr. Blanton contacted the media. There was no legitimate, work related reason to access this report which was about an incident that occurred ten (10) months earlier.

If Mr. Pitcher and Mr. Krofta knew in advance that I intended to discuss Mr. Blanton's conduct, I do not believe that either would have appeared in my office. So I scheduled meetings with both close in time to attempt to avoid them communicating about my meeting. My goal was to get honest and complete answers about Mr. Blanton's involvement without them coordinating their responses. Despite my efforts, I believe that Mr. Pitcher and Mr. Krofta did communicate before the meeting. I formed this conclusion because Mr. Krofta asked to my receptionist to meet with me even though the meeting was scheduled with another attorney. I believe that text communications between Mr. Krofta and Mr. Pitcher on this date may shed light upon what they discussed about the incident.

At approximately 1:00 pm on November 6, 2024, I spoke with Mr. Pitcher at my office. After discussing the Maciejewski case in Superior 3, I asked Mr. Pitcher why he accessed a CFS24-001584 which was unrelated to his work as an officer with the Cambridge City Police Department. Mr. Pitcher told me he was simply curious. He did not have a work-related or professional reason to access the information. He also told me he did not share the information he received with Mr. Blanton. I asked him why Mr. Krofta accessed the same information six (6) minutes before he did. Mr. Pitcher did not have an explanation for this coincidence. He also said that he did not discuss the issue with Mr. Krofta. I found it a striking coincidence that they accessed the same call for service, six (6) minutes apart, on an incident that occurred (10) months prior and had nothing to do with their jobs. It seems highly unlikely the two individuals were not discussing/texting about the call for service. Mr. Pitcher accessed CFS24-001584 from a Cambridge City Police Department computer while on duty and without a reason related to his professional duties.

At approximately 1:30 pm, on the same date, I spoke with Mr. Krofta. After discussing the Turner case in Superior 2, I asked him about accessing CFS24-001584. Mr. Krofta acknowledged looking at CFS24-001584. I asked why he looked it up since it was unrelated to his job duties. Mr. Krofta said "there were definitely rumors." I again asked him how that was related to his job, and he responded "I am not going to get into this discussion with you" and he left my office. Mr. Krofta accessed CFS24-001584 from an RPD computer while on duty and without a reason related to his professional duties.

On November 6<sup>th</sup>, 2024, I also reached out to RPD officer Jourdan Brouse via text. I wanted to ask him why he accessed CFS24-001584 multiple times on his MDT. He accessed the call on October 11, April 15 and March 16, 2024. This is unusual to me for four reasons: (1) he was not involved in the investigation of that incident; (2) he accessed the service call on October 10, 2024, one day after I mailed my Brady-Giglio letter to you about Adam Blanton; (3) the call for service he accessed contained relatively little information, so it is unclear why it would need to be accessed three separate times to understand what information was in it; and (4) he accessed the information well past the incident date, so something must have motivated him to look at the record on those dates. Based upon these incidents, I wanted to find out why Officer Brouse accessed CFS24-001584. Officer Brouse told me that you instructed him not to respond to my requests.

## II. Policies Implicated by Officers Blanton and Krofta's Conduct

I believe the following policies have been violated by Officers Blanton and/or Krofta as specified below and ask you to assign an investigator for follow-up:

### A. 321.5.2, CODE OF ETHICS

(b) The wrongful or unlawful exercise of authority on the part of any member for malicious purpose, personal gain, willful deceit or any other improper purpose.

RPD Policy Manual, Standards of Conduct 321.5.2 Ethics, page 171; AND

### B. 321.5.6 UNAUTHORIZED ACCESS, DISCLOSURE, OR USE

(a) Unauthorized and inappropriate intentional release of confidential or protected information, materials, data, forms, or reports obtained as a result of the member's position with this department.

(c) The use of any information, photograph, video, or other recording obtained or accessed as a result of employment or appointment to this department for personal or financial gain or without the express authorization of the Chief of Police or the authorized designee.

RPD Policy Manual, Standards of Conduct 321.5.2 Ethics, page 171

I believe Mr. Blanton violated these provisions by his wrongful exercise of authority as Assistant Chief of Police and Public Information Officer when he transmitted information about CFS24-001584 to reporter Evan Weaver. He did so for a non-work related reason, specifically retaliation for placing him on the Brady-Giglio list. Doing so is an "improper purpose" pursuant to this policy.

### C. 322.1.1 DEFINITIONS

Definitions related to this policy include:

**Computer system** - All computers (on-site and portable), electronic devices, hardware, software, and resources owned, leased, rented or licensed by the Richmond Police Department that are provided for official use by its members. This includes all access to, and use of, Internet Service Providers (ISP) or other service providers provided by or through the Department or department funding.

**Hardware** - Includes, but is not limited to, computers, computer terminals, network equipment, electronic devices, telephones (including cellular and satellite), modems or any other tangible computer device generally understood to comprise hardware.

**Software** - Includes, but is not limited to, all computer programs, systems and applications, including shareware. This does not include files created by the individual user.

**Temporary file, permanent file or file** - Any electronic document, information or data residing or located, in whole or in part, on the system including, but not limited to, spreadsheets, calendar entries, appointments, tasks, notes, letters, reports, messages, photographs or videos.

### 322.2 POLICY

It is the policy of the Richmond Police Department that members shall use information technology resources, including computers, software and systems, that are issued or maintained by the Department in a professional manner and in accordance with this policy.

#### 322.4.2 HARDWARE

Access to technology resources provided by or through the Department shall be strictly limited to department-related activities. Data stored on or available through department computer systems shall only be accessed by authorized members who are engaged in an active investigation or assisting in an active investigation, or who otherwise have a legitimate law enforcement or department-related purpose to access such data. Any exceptions to this policy must be approved by a supervisor.

RPD Policy Manual, Information Technology Use, 322.4.2, pg. 177

#### 322.4.3 INTERNET USE

Internet access provided by or through the Department shall be strictly limited to department related activities. Internet sites containing information that is not appropriate or applicable to department use and which shall not be intentionally accessed include, but are not limited to, adult forums, pornography, gambling, chat rooms, and similar or related Internet sites. Exceptions may be permitted with the express approval of a supervisor as a function of a member's assignment. Downloaded information from the Internet shall be limited to messages, mail and data files.

RPD Policy Manual, Information Technology Use, 322.4.2, pg. 177

Mr. Blanton violated this policy if he used his department issued mobile phone or computer to communicate with reporter Evan Weaver about CFS24-001584.

Mr. Krofta violated this policy by using an RPD computer to access information unrelated to his professional duties by examining CFS24-001584.

### 325.3 RESPONSIBILITIES

The ultimate authority and responsibility for the release of information to the media shall remain with the Chief of Police. Any and all situations involving the release or potential of any release of information by the Richmond Police Department require notification made to the Chief of Police and Deputy Chief of Operations. In some situations after required notice to the Chief and Deputy Chief of Operations and where the Chief of Police has given prior

approval, Division Commanders, Watch Commanders and designated Public Information Officers (PIOs) may prepare and release information to the media following this policy and applicable laws regarding confidentiality.

RPD Policy Manual, Media Relations, 325.5, pg. 186

Mr. Blanton violated this policy if the information he conveyed to reporter Evan Weaver about CFS24-001584 was not authorized by you, RPD Police Chief Kyle Weatherly. I do not know if you were aware of Mr. Blanton's conversation with the reporter about CFS24-001584. I ask that this issue be independently investigated.

#### 701.2 POLICY

The Richmond Police Department allows members to utilize department-issued or funded PCDs and to possess personally owned PCDs in the workplace, subject to certain limitations. Any PCD used while on- or off-duty for business-related purposes, or reasonably associated with work related misconduct, will be subject to monitoring and inspection consistent with applicable law and this policy.

Additionally, the use of a PCD either on-duty or after duty hours for business-related purposes, or reasonably associated with work-related misconduct, may subject the member and the member's PCD records to civil or criminal discovery or disclosure under the Indiana Access to Public Records Act.

#### 701.3 PRIVACY EXPECTATION

Members forfeit any expectation of privacy with regard to any communication accessed, transmitted, received, or reviewed on any PCD issued or funded by the Department and shall have no expectation of privacy in their location should the device be equipped with location detection capabilities. This includes records of all keystrokes or web-browsing history made on the PCD.

The fact that access to a database, service, or website requires a username or password will not create an expectation of privacy if it is accessed through department PCDs or networks (see the Information Technology Use Policy for additional guidance). Members have no expectation of privacy regarding any communications while using a personally owned PCD for department-related business or when the use reasonably implicates work-related misconduct.

#### 701.4 DEPARTMENT-ISSUED PCD

Depending on a member's assignment and the needs of the position, the Department may, at its discretion, issue or fund a PCD for the member's use to facilitate on-duty performance.

Department-issued or funded PCDs may not be used for personal business either on- or off duty unless authorized by the Chief of Police or the authorized designee. Such devices and the associated telephone number, if any, shall remain the sole property of the Department

and shall be subject to inspection or monitoring (including all related records and content) at any time without notice and without cause.

#### 701.6 USE OF PCD

The following protocols shall apply to all PCDs that are carried while on-duty or used to conduct department business:

- (c) A PCD may not be used to conduct personal business while on-duty except for brief personal communications (e.g., informing family of extended hours). Members shall endeavor to limit their use of PCDs to authorized break times unless an emergency exists.
- (g) Using PCDs to harass, threaten, coerce, or otherwise engage in inappropriate conduct with any third party is prohibited. Any member having knowledge of such conduct shall promptly notify a supervisor.

RPD Policy Manual, Personal Communication Devices, 701.2, 701.3, 701.4 and 701.6

It is unclear to me whether Mr. Blanton also used a PCD to communicate with reporter Evan Weaver about CFS24-001584. If he did, I believe it is a violation of these provisions. Obtaining messages on any PCD he owned and used while on duty could be used to determine whether these provisions have been violated.

#### 1003.3 RETALIATION PROHIBITED

No member may retaliate against any person for engaging in lawful or otherwise permitted behavior; for opposing a practice believed to be unlawful, unethical, discriminatory or retaliatory; for reporting or making a complaint under this policy; or for participating in any investigation related to a complaint under this or any other policy.

Retaliation includes any adverse action or conduct, including but not limited to:

- Refusing to hire or denying a promotion.
- Extending the probationary period.
- Unjustified reassignment of duties or change of work schedule.
- Real or implied threats or other forms of intimidation to dissuade the reporting of wrongdoing or filing of a complaint, or as a consequence of having reported or participated in protected activity.
- Taking unwarranted disciplinary action.
- Spreading rumors about the person filing the complaint or about the alleged wrongdoing.
- Shunning or unreasonably avoiding a person because he/she has engaged in protected activity.

RPD Policy Manual, Anti-Retaliation, 1003.3, page 534

Note that other sections of this policy appear to apply to officers. However, this provision is not restricted to be applicable to only officers at RPD. It reads, “No member may retaliate against any person for engaging in lawful or otherwise permitted behavior...” (Emphasis added).



It should also be noted that seven (7) examples of “retaliation” are listed, but that list is not exhaustive. “Retaliation includes any adverse action or conduct, including but not limited to...”

I believe that I am included in the definition of “any person.” I exercised my discretion to place Mr. Blanton on the Brady-Giglio was both “lawful” and “permitted behavior.” Contacting the press for the sole purpose of attempting to embarrass me was improper under this provision.

Regarding Officer Brouse, I do not know if his motivation for accessing CFS24-001584 was to assist Mr. Blanton in some fashion or for other reasons. I would like to know.

I also know there were other people who accessed CFS24-001584. Some worked for RPD and some for other agencies. The focus of my complaint is on using the information in CFS24-001584 for an improper purpose or accessing it improperly outside of the scope of professional duties. I understand that some people are simply nosy and enjoy looking up incidents about others for entertainment, despite it being an abuse of the EOC call for service system.

I also wanted to tell you that Jeff Lane from KICKS 96 called this morning asking for public records regarding Mr. Blanton being placed on the Brady-Giglio list. I did not call Mr. Lane or any other media representative seeking to publicize Mr. Blanton being placed on the list. If I am going to give information to the media, I will tell the person I am doing so. But I am advising you that the list is a public record that I am required to release.

Thank you for your attention to these matters.

Sincerely,



Michael W. Shipman  
Prosecuting Attorney

Attachments:

Wayne County EOC Audit Trail (4 pages)  
Request for Public Records, Evan Weaver



# Wayne County Emergency Communications

Richmond, Indiana

Audit Trail

Printed on November 5, 2024

Date	User	Event	Record #	Record Type	Record #	Computer	IP	Owner Agency	User Agency
11/05/24 11:00	WC01 - Campbell, Erin	Audit View	CFS24-001584	CFS	CFS24-001584	DIS02		Wayne County Emergency Communications E-911	Wayne County Emergency Communications E-911
11/05/24 11:00	WC01 - Campbell, Erin	Print Preview		CFS	CFS24-001584	DIS02		Wayne County Emergency Communications E-911	Wayne County Emergency Communications E-911
11/05/24 11:00	WC01 - Campbell, Erin	View		CFS	CFS24-001584	DIS02		Wayne County Emergency Communications E-911	Wayne County Emergency Communications E-911
11/05/24 11:00	WC01 - Campbell, Erin	Print Preview		CFS	CFS24-001584	CAD5		Wayne County Emergency Communications E-911	Wayne County Emergency Communications E-911

Date	User	Event	Record Type	Record #	Computer	IP	Owner Agency User Agency
11/05/24 10:59	WC01 - Campbell, Erin	View	CFS	CFS24-001584	CAD5		WCEC - Wayne County Emergency Communication s E-911
10/31/24 13:57	WC01 - Campbell, Erin	View	CFS	CFS24-001584	DIS02		WCEC - Wayne County Emergency Communication s E-911
10/31/24 13:29	WC01 - Campbell, Erin	Audit View	CFS	CFS24-001584	DIS02		WCEC - Wayne County Emergency Communication s E-911
10/31/24 13:29	WC01 - Campbell, Erin	View	CFS	CFS24-001584	DIS02		WCEC - Wayne County Emergency Communication s E-911
10/31/24 12:25	WC01 - Campbell, Erin	Print Preview	CFS	CFS24-001584	DIS02		WCEC - Wayne County Emergency Communication s E-911
10/31/24 12:22	WC01 - Campbell, Erin	View	CFS	CFS24-001584	DIS02		WCEC - Wayne County Emergency Communication s E-911
10/25/24 14:17	C5 - Pitcher, Dillon	View	CFS	CFS24-001584	CCITYPDCAM PC		WCEC - Wayne County Emergency Communication s E-911

Date	User	Event	Record Type	Record #	Computer	IP	Owner Agency User Agency
10/25/24 14:11	702 - Krofta, Brandon	View	CFS	CFS24-001584	RPDMDTKRO FTA		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
10/25/24 14:07	702 - Krofta, Brandon	View	CFS	CFS24-001584	RPDMDTKRO FTA		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
10/25/24 14:04	702 - Krofta, Brandon	View	CFS	CFS24-001584	RPDMDTKRO FTA		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
10/11/24 23:29	720 - Brouse, Jourdan	View	CFS	CFS24-001584	RPDMDT104		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
09/07/24 09:33	C2 - Biava, Seth	View	CFS	CFS24-001584	CCPD1		WCEC - CCPD - Wayne County Cambridge City Emergency Police Communication Department s E-911
04/15/24 02:38	720 - Brouse, Jourdan	View	CFS	CFS24-001584	RPDMDT104		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
04/03/24 20:25	CM3 - Lakes, Dyllin	View	CFS	CFS24-001584	CPD6		WCEC - CVPD - Wayne County Centerville Emergency Police Communication Department s E-911

Date	User	Event	Record Type	Record #	Computer	IP	Owner Agency User Agency
04/03/24 20:11	CM3 - Lakes, Dylin	View	CFS	CFS24-001584	CPD6		WCEC - CVPD - Wayne County Centerville Emergency Police Communication Department s E-911
04/03/24 20:08	CM3 - Lakes, Dylin	View	CFS	CFS24-001584	CPD6		WCEC - CVPD - Wayne County Centerville Emergency Police Communication Department s E-911
03/16/24 04:38	720 - Brouse, Jourdan	View	CFS	CFS24-001584	RPDMMDT104		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
03/16/24 04:38	720 - Brouse, Jourdan	View	CFS	CFS24-001584	RPDMMDT104		WCEC - RPD - Wayne County Richmond Emergency Police Communication Department s E-911
03/05/24 16:07	Hollis, Tim	View	CFS	CFS24-001584	PROBL08		WCEC - WCPB - Wayne County Wayne County Emergency Probation Communication Department s E-911
03/05/24 16:07	Hollis, Tim	View	CFS	CFS24-001584	PROBL08		WCEC - WCPB - Wayne County Wayne County Emergency Probation Communication Department s E-911
03/05/24 16:07	Hollis, Tim	View	CFS	CFS24-001584	PROBL08		WCEC - WCPB - Wayne County Wayne County Emergency Probation Communication Department s E-911

Wayne County Emergency Communications



Erin L. Campbell  
Deputy Director

Request for Public Records

I.C. 5-14-3-5

It shall be the policy of the Wayne County Emergency Communications Department to provide any public information upon request which is allowed under the law (I.C. 5-14-3-5) to all citizens.

If the information you have requested is not allowed to be released, you will be advised of that information and the agency that is holding the information. For example, if you request information from us that is directly related to an investigation or pending a judicial proceeding, your request may be denied and you will be referred to the appropriate agency.

I hereby request a copy of the information permitted by law of the following incident.

Today's Date: 10-31-24

Name of caller: ~~Jan 2024~~

Date of incident: Jan 2024

Time of incident: UNKNOWN

Address or location of incident: Centerville

Brief description of incident: CFS 24-001584

B  
2nd Request: Wayne County Prosecutor's Brady/Giglio List

Your Name: [Redacted]

Address: [Redacted]

Telephone: [Redacted] Fax No. [Redacted]

Email address: [Redacted]

How would you like to receive your information?  Email to email address provided.

Sent by fax to the listed number.  I will return and pick up the copy.

For office use only: Date Request Received: \_\_\_\_\_  
Signature of Authorized Personnel releasing information: \_\_\_\_\_

Date Provided: \_\_\_\_\_

9:54

5:36

58

&lt; 822

5 Messages

**Michael Shipman**

9:36 AM

To: Dillon Cc: Austin &amp; 3 more... &gt;

**RE:** [REDACTED]

Good morning Dillon:

I appreciate you speaking with me. I continue to have reservations about your association with Adam Blanton and accessing a CFS unrelated to your duties. The timing of that event troubles me. I must feel confident that an officer is not working against our office in order to pursue his or her cases. At this time, I am declining to file your cases.

**Michael W. Shipman**Prosecuting Attorney  
[REDACTED]

Caution! This message was sent from outside your organization.

[Block sender](#)