

STATE OF INDIANA )  
 ) SS:  
COUNTY OF JOHNSON )

IN THE JOHNSON CIRCUIT/SUPERIOR COURT  
41C01 1609F6000405  
CAUSE NUMBER. 41

STATE OF INDIANA

VS

INFORMATION FOR:  
NEGLECT OF A DEPENDENT

CHEYANNE VERNICE MEREDITH  
502 N. Clay St.  
Edinburgh, IN 46124  
DOB: 11/11/1994  
SSN: XXX-XX-2474

I.C. 35-46-1-4(a)(1)

a Level 6 Felony

**FILED**

**SEP 01 2016**

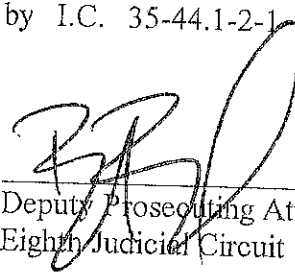
*Sue Anne Misinice*  
CLERK, JOHNSON CIRCUIT & SUPERIOR COURTS

The undersigned affiant, being duly sworn upon his oath, says that he is informed and verily believes that:

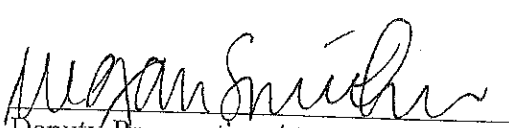
on, about, or between January 21, 2016 and February 11, 2016 in Johnson County, State of Indiana, Cheyanne Vernice Meredith having the care of S.M., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life and/or health.

All of which is contrary to the laws of the State of Indiana.

I affirm under the penalties of perjury as specified by I.C. 35-44.1-2-1 that the foregoing representations are true.

  
Deputy Prosecuting Attorney  
Eighth Judicial Circuit

Approved by me this 1<sup>st</sup> day of September, 2016.

  
Deputy Prosecuting Attorney  
Eighth Judicial Circuit

I/we hereby certify, to the best of our knowledge, that the foregoing document complies with the requirements of Trial Rule 5(G) with regard to information excluded from the public record by Administrative Rule 9(G).

State of Indiana, County of Johnson, SS:

## Probable Cause Affidavit

Detective David Lutz of the Edinburgh Police Department, who swears that he believes and has good cause to believe the following facts and circumstances: Neglect of a Dependent Child occurred at 500 East Main Cross Street in Edinburgh, Johnson County, Indiana.

The suspect in this case is: **Cheyenne Vernice Meredith DOB: 11/11/1994.**

Your affiant received information from Bradley McCarty of the Department of Child Services (hereinafter referred to as DCS) and from the Edinburgh Eastside Elementary School.

On January 21, 2016, Edinburgh Eastside School based therapist from Adult and Child, Joanna Spray stated she had shifted focus of Meredith's family therapy with Cheyanne Meredith to parenting skills. Spray stated S██████ has sexualized behaviors at school. She stated he has told other students that he wants to "put his pee pee in their mouth." She stated he has also drawn penises on gingerbread men. Spray further stated there have been concerns about lack of supervision by Cheyanne. She stated the family is finding loopholes because Edinburgh is in 3 different counties. Spray stated Cheyanne Meredith does not have strong parenting skills. Spray stated the school has had to wash Meredith's five year old son, S██████'s clothes because Meredith will send him to school in the same pants 9 days in a row. Spray stated last week they had to throw away S██████'s backpack because it smelled so bad. Spray stated there are a lot of concerns about hygiene and supervision with Meredith. Department of Child Services were notified and Brad McCarty was assigned to address concerns at Cheyanne's house, which is in Johnson County. Bartholomew County DCS has an open investigation involving Meredith's two year old daughter, K██████ M██████ who has come home from visits with bruises after visitation with her father, who lives in Columbus. Spray stated Meredith has concerns because, K██████'s father, Dylan Ray Merritt has a temper.

On February 1, 2016 your affiant responded to the Eastside Elementary School investigating a battery report on S██████ M██████. Your affiant interviewed S██████ in reference to the injuries on his face that were reported by the school. Your affiant photographed the injuries and recorded a statement taken from S██████. S██████ informed your affiant he had fallen down at first on a brick floor in his home, (your affiant later discovered they don't have a brick floor) S██████ then stated his uncle hit him with a toy fire truck. S██████ had several stories about how it occurred and was all over the place. S██████ has been diagnosed with attention deficit disorder (ADD). S██████ was very hyper but apprehensive about talking about the injuries. School staff stated S██████ is usually very dirty and smells when he comes to school. He looks disheveled at times.

Your affiant and Brad McCarty of DCS drove to Meredith's home located at 500 E. Main Cross Street in Edinburgh. Meredith answered the door and came outside, closing the door behind her. She would not let your affiant or McCarty inside stating the 15-20 dogs in the home would be barking and jumping on everyone. Meredith further stated she her Uncle William and Aunt Charity Ayers rent the home and would not like her inviting others into the home. She stated S██████ is very hyper and his medication for ADD wears off later in the day which is why he probably could not sit still for your affiant. She did not know he had a bruise. Charity and William mainly take care of S██████ because Meredith works nights at Buffalo Wild Wings in Columbus. Meredith is starting to work more first shifts now. Meredith told your affiant her daughter is involved with Department of Child Services in Bartholomew County. Her name is K██████ M██████. She came home with an unexplained bruise from her father's home. Meredith uncle, William Ayers has never been known to be violent and is good with S██████. He has spanked S██████ on the butt but never has abused S██████. They spank S██████ on the butt and it is always over the clothes. Sometimes, S██████'s medications will wear off and he is violent towards himself. He will hit himself in the head at times. He has a tendency to make up stories and lie.

He gets his medication for ADD in the mornings.

Meredith told your affiant they have running hot water in the home and it is heated with space heaters she said. The natural gas had been shut off. They mainly stay upstairs. S█ gets a bath every other night at least. She did not know he was filthy in appearance today. Meredith did not seem concerned about the injury. McCarty asked if Meredith could take S█ to get checked out by a doctor and she made several excuses like they were closed. McCarty suggested taking him to an immediate care facility since they stay open later or the emergency room. Meredith stated he bruises easily and must have fallen down. Meredith stated she would take him to a doctor that night to get examined. Meredith stated her baby was upstairs, but again refused our entry after your affiant asked to see the infant.

On February 2, 2016 Bradley received a text message from Meredith stating she was not able to get S█ to a doctor yesterday because of no vehicle. Meredith then text she has not gone today because she is at Riley getting a test ran on her daughter. Bradley texted Meredith and asked if she had taken S█ to the hospital. Meredith text back and stated she did not have a chance due to her aunt and uncle had to work overtime. Bradley asked if she could take him today. Meredith replied she will try but she is at Riley Hospital with her daughter which is getting another test performed. Bradley asked if there is anyone else to take him. Meredith responded by saying she does not neglect her children and she does not have time to deal with this right now.

On February 4, 2016 Bradley went to Cheyanne Meredith's home for a meeting with Cheyanne's aunt and uncle, Charity and William Ayers. William stated Meredith has a bad temper with the kids, especially S█. Meredith did not want to take him to the hospital and they got into an argument about it. Meredith left last night and they have not heard from her or the kids. William stated Meredith always has her grandfather's car so there is no reason for S█ not to go to the hospital. William and Charity told her they would have taken him but Cheyanne's sister ended up taking S█. S█ told William and Charity his mother smacked him and he fell down the stairs. They insisted that S█ tell the truth and he told them that he was telling the truth. S█ is on medication for ADD. According to William, Meredith can't handle him. She does not want her children and she wants to hang out with her boyfriend's. They are not aware of when K█ was hit but they did notice a bruise. Meredith and K█'s father, Dylan blame each other for everything so they are unsure of how it occurred. Meredith does not give the children baths regularly and S█ feeds the baby at times because Meredith is unwilling. Meredith always allows her friends to watch her kids and just drops them off. Meredith even sneaks out when the kids are asleep leaving them alone at times. Meredith won't feed her own kids so William and Charity do it. Meredith has been seen smacking them in their faces and butts at times. William did whip S█ on Saturday because S█ stuck a knife in the electrical socket. One day they were sitting downstairs and S█ came rolling down the stairs. Meredith then appears seconds later and said she was sorry and didn't mean to push him down the stairs. She acted like she did not know they were downstairs. Ayers have many concerns for the kids in her care.

On February 5, 2016 Bradley went to Eastside Elementary unannounced to visit with S█. S█ refused to talk at first and went and hid in the restroom. He then came out. Bradley and S█ play Paper, Rock, Scissors game and he opened up. Whoever won would ask a question. Bradley won and asked where S█ got the bruise on his face from. S█ stated his mom smacked him in the face and he then fell down the stairs. He then repeated it later on and pointed to where he was hit when falling down the stairs. He said it hurt. S█ has a stench to him and appeared filthy. His hair was a mess and did not appear washed in a while. His clothes had stains and dirt marks in them.

Bradley talked with S█'s teacher, Melissa Crawhorn. S█ is always starving. Staff had to help S█ learn to use a fork to eat. He has been observed by teachers diving on the floor to eat others food that was dropped. He smells like urine and animal feces sometimes. He is always filthy. Meredith makes him get up and feed the baby

at night and refuses to help. He has been observed outside of his home late at night with no adults present. S██████ was sent several boxes of clothes from school before Christmas. They have not seen any of those clothes being worn and he wears the same outfit most days. S██████ presents as if does not take a shower. His mother tells him not to talk to school staff. The school got him three winter coats this winter and he has lost them all. They have to wash them every other day when he comes to school because they are filthy or smell like animal urine. There is believed to be more than six dogs in the home. S██████ told the custodian he fell to the ground after his mother smacked him. The custodian asked when she saw his face was bright red. There appeared to be a large bruise that appeared fresh on the right side of his anterior face as well as above his left eye orbit in the brow which was swollen and reddened. There appeared to be impressions consistent with finger lines on his left cheek. This was on Tuesday. S██████ has told school staff his mother makes him watch movies where people are laying on top of each other naked. He said he closes his eyes. The last three weeks S██████ has had aggressive behavior. He was seen by Adult and Child but recently mom is not letting them into the home. He has missed 20 days of school. He is way below average with grades and he is capable of doing better. He appears tired all of the time at school.

Bradley talked with the school Nurse Susan Lollar. S██████ told Lollar he was stamped on the face. The nurse took pictures of the bruise and forwarded them to McCarty. He is always dirty in appearance. She assists with washing S██████'s coat. Lollar knows they have washed it around three times in last month. They do not keep a log of when they wash it. Photos were provided to your affiant as well.

Bradley talked with the Custodian Carla Collins. S██████ has a head band on his face. He moved it down and she observed the red marks on his face. She asked him what had happened. She could see the hand print on his face. He told her his mom smacked him so hard on the side of his face that he fell down. She stated you could see also where his face made contact with something else when he fell.

Bradley spoke with school counselor, Paula Wright. He eats in her office almost daily. He does better when he is alone. He is dirty and filthy most days. Does not appear he gets showered. He wears the same pants a lot. He comes to school with circles under his eyes most days. Appears he does not get much sleep and he is very tired at school. She noticed the red marks on his face earlier in the week. It looked like blood vessels were broken under the skin. Kind of appeared like finger marks or lines. He told Wright his mom hit him. At first he said he fell. He had his mother's phone and he would not give it back. She then hit him he said causing him to fall. She has concerns for him.

Bradley talked with the Assistant teacher Mandy Bryant. Bryant saw S██████ riding his bicycle down the middle of Main Cross Street at 8pm a month ago with no adults present. S██████ was blocks away from his home. Bryant stopped her car and someone else stopped and pointed him in the direction of his home and told him to go home. Everyone in town knows where he lives because he is always outside and all over the town. They live on a busy street. He is usually very dirty and messy. She saw lots of scratches and bruising on him recently.

On February 5, 2016 Bradley text Meredith asking if S██████ ever went to the doctor. Meredith told Bradley he had went. Meredith said her sister Brittany took him yesterday and the doctor told her it was normal bruising for a five year old. Meredith then told Bradley to leave her sister alone and not to talk with her sister. Bradley asked Meredith to be honest about what really happened to S██████. She said she is being honest and does not know. She was not home. The doctor even said he has bruising of a normal five year old boy. Bradley stated that is not normal bruising and that there was a hand print on his face. She then stated that Bradley does not know her son. He is ADD and the doctor told her sister he probably put it there with how he acts hitting himself and throwing chairs. She then stated she is going to get Bradley for harassment and DCS has been to her house back to back 3 or 4 times this month and nothing is ever wrong. Meredith told Bradley if he talks to her underage son again she is going to press charges.

Riley Hospital was contacted about the visits and exams on another report of Meredith's infant, A [REDACTED] starving to death, legs look like thin fingers instead of legs. A [REDACTED] is 3.4 months old and considerably underweight by 4-5 pounds. Riley reports A [REDACTED]'s diagnosis as failing to thrive do to not being fed. A [REDACTED]'s birth weight was 8.6 pounds and on January 31<sup>st</sup> she weighed 9.8 pounds. A [REDACTED] should weigh between 12.5 to 14.9 pounds. A [REDACTED] has no medical deficiencies to account for the failure to thrive. A [REDACTED] isn't being fed.

On February 11, 2016, a search warrant was obtained and executed by your affiant at 500 E. Main Cross Street where your affiant and other officers as well as Animal Control entered the home and found four dogs were turned over to Animal Control. Your affiant had an evidence technician, Rick Wilson photograph the home inside and out at your affiant's direction. In the downstairs your affiant noted animal urine on the floor. To heat the home your affiant saw two electronic standalone fireplaces. The natural gas was shut off, lack of payment. Water and sewer were working. Food supply was plentiful for the adults. Infant formula, there were seven sealed cans unopened three small jars of expired baby food all were photographed. One partial can of formula on the kitchen counter and an empty can in the upstairs bedroom.

Up a staircase off of the living room led your affiant to an upstairs bedroom which Meredith claimed as theirs. Your affiant saw fecal matter in several areas on the floor of S [REDACTED]'s bedroom. No mattress coverings or blankets for S [REDACTED]. The mattress had two sizable black areas which appeared to be black mold. Your affiant found pull-tab style cans of food under S [REDACTED]'s bed with dirty bowls. In the box springs were several dishes of dirty dishes. The floor was filthy and no smoke detectors were seen. No clean clothes were seen anywhere upstairs, dirty clothes were on the floor. In the next room your affiant saw two baby beds and another mattress for Meredith. A kitchen style tall trash can was overflowing onto the floor with dirty diapers. Numerous empty used Polar pop cups and Buffalo Wild Wings cups next to Meredith's bed with a package of cookies. In the baby beds were several toys, stuffed animals and other debris. All of which isn't proper bedding for an infant adhering to the national back to sleep program in an attempt to avoid infant deaths.

I swear or affirm under the penalty of perjury as specified in IC 35-44-2-1 that the foregoing representations are true. (IC 35-1-2-4)

\_\_\_\_\_  
Affiant

\_\_\_\_\_  
Judge of \_\_\_\_\_ Court  
of Johnson County

Reviewed by:

\_\_\_\_\_  
Deputy Prosecuting Attorney  
8<sup>th</sup> Judicial District