

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION

Cause No: 49D32

INFORMATION

**COUNT I**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT II**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(3)(A)

A LEVEL 2 FELONY

**COUNT III**

KIDNAPPING

I.C. 35-42-3-2(a) and I.C. 35-42-3-2(b)(3)(A)

A LEVEL 3 FELONY

**COUNT IV**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a) and I.C. 35-42-3-3(b)(3)(A)

A LEVEL 3 FELONY

**COUNT V**

SEXUAL BATTERY

I.C. 35-42-4-8(a)(1)(A)

A LEVEL 6 FELONY

**COUNT VI**

STRANGULATION

I.C. 35-42-2-9(c)

A LEVEL 6 FELONY

**COUNT VII**

BATTERY RESULTING IN BODILY  
INJURY

I.C. 35-42-2-1(c)(1) and I.C. 35-42-2-1(d)(1)

A CLASS A MISDEMEANOR

**COUNT VIII**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT IX**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT X**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XI**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

STATE OF INDIANA )  
vs. )  
                )

DARRELL GOODLOW B/Male  
DOB 7/18/1984

**COUNT XII**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XIII**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XIV**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(2)

A LEVEL 3 FELONY

**COUNT XV**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XVI**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XVII**

KIDNAPPING

I.C. 35-42-3-2(a)

A LEVEL 6 FELONY

**COUNT XVIII**

INTIMIDATION

I.C. 35-45-2-1(a)(1) and I.C. 35-45-2-1(b)

(1)(A)

A LEVEL 6 FELONY

**COUNT XIX**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XX**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XXI**

INTIMIDATION

I.C. 35-45-2-1(a)(1) and I.C. 35-45-2-1(b)

(1)(A)

A LEVEL 6 FELONY

**COUNT XXII**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XXIII**

KILLING A DOMESTIC ANIMAL

I.C. 35-46-3-12(d)

A LEVEL 6 FELONY

**COUNT XXIV**

BATTERY RESULTING IN BODILY

INJURY

I.C. 35-42-2-1(c)(1) and I.C. 35-42-2-1(d)

(1)

A CLASS A MISDEMEANOR

**COUNT XXV**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XXVI**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XXVII**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XXVIII**

RAPE

I.C. 35-42-4-1(a)(1)

A LEVEL 3 FELONY

**COUNT XXIX**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(2)

A LEVEL 3 FELONY

**COUNT XXX**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a)

A LEVEL 6 FELONY

**COUNT XXXI**

STRANGULATION

I.C. 35-42-2-9(c)

A LEVEL 6 FELONY

**COUNT XXXII**

SEXUAL BATTERY

I.C. 35-42-4-8(a)(1)(A)

A LEVEL 6 FELONY

**COUNT XXXIII**

BATTERY RESULTING IN BODILY  
INJURY

I.C. 35-42-2-1(c)(1) and I.C. 35-42-2-1(d)  
(1)

A CLASS A MISDEMEANOR

**COUNT XXXIV**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)  
(1)

A LEVEL 1 FELONY

**COUNT XXXV**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)  
(1)

A LEVEL 1 FELONY

**COUNT XXXVI**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)  
(1)

A LEVEL 1 FELONY

**COUNT XXXVII**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(2)

A LEVEL 3 FELONY

**COUNT XXXVIII**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a) and I.C. 35-42-3-3(b)(1)

(C)

A LEVEL 5 FELONY

**COUNT XXXIX**

STRANGULATION

I.C. 35-42-2-9(c)

A LEVEL 6 FELONY

**COUNT XL**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XLI**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XLII**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XLIII**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XLIV**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT XLV**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(3)(A)

A LEVEL 2 FELONY

**COUNT XLVI**

KIDNAPPING

I.C. 35-42-3-2(a) and I.C. 35-42-3-2(b)(3)(A)

A LEVEL 3 FELONY

**COUNT XLVII**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a) and I.C. 35-42-3-3(b)(3)(A)

A LEVEL 3 FELONY

**COUNT XLVIII**

STRANGULATION

I.C. 35-42-2-9(c)

A LEVEL 6 FELONY

**COUNT XLIX**

INTIMIDATION

I.C. 35-45-2-1(a)(1) and I.C. 35-45-2-1(b)(1)(A)

A LEVEL 6 FELONY

**COUNT L**

SEXUAL BATTERY

I.C. 35-42-4-8(a)(1)(A)

A LEVEL 6 FELONY

**COUNT I**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT II**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT III**

RAPE

I.C. 35-42-4-1(a)(1) and I.C. 35-42-4-1(a)(1)

A LEVEL 1 FELONY

**COUNT IV**

BURGLARY

I.C. 35-43-2-1 and I.C. 35-43-2-1(1)

A LEVEL 4 FELONY

**COUNT V**

CRIMINAL CONFINEMENT

I.C. 35-42-3-3(a) and I.C. 35-42-3-3(b)(1)(C)

A LEVEL 5 FELONY

**COUNT VI**

SEXUAL BATTERY

I.C. 35-42-4-8(a)(1)(A)

A LEVEL 6 FELONY

**COUNT VII**

BATTERY RESULTING IN BODILY

INJURY

I.C. 35-42-2-1(c)(1) and I.C. 35-42-2-1(d)(1)

A CLASS A MISDEMEANOR

On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on his/her oath (or having affirmed), says that in Marion County, Indiana

**COUNT I**

On or about August 20, 2020, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with D.H.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT II**

On or about August 20, 2020, DARRELL GOODLOW did break and enter the building or structure of D.H., to-wit: a dwelling; with the intent to commit a felony therein, to-wit: Rape, which is to knowingly or intentionally have sexual intercourse and/or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with D.H.; when such person was compelled by force, and/or compelled by the imminent threat of force, while armed with a deadly weapon,

to-wit: a knife;

**COUNT III**

On or about August 20, 2020, DARRELL GOODLOW, while armed with a deadly weapon, to-wit: a knife, did knowingly remove D.H. by threat of force from one place, to-wit: outside the bedroom to another, to wit: inside in the bedroom;

**COUNT IV**

On or about August 20, 2020, DARRELL GOODLOW did knowingly confine D.H. without the consent of D.H., said DARRELL GOODLOW being armed with a deadly weapon, to wit: a knife;

**COUNT V**

On or about August 20, 2020, DARRELL GOODLOW, with the intent to arouse or satisfy the sexual desires of Darrell Goodlow and/or D.H., did compel D.H. to submit to a touching by force and/or imminent threat of force;

**COUNT VI**

On or about August 20, 2020, DARRELL GOODLOW in a rude, insolent or angry manner, did knowingly apply pressure to the throat or neck of D.H. in a manner that impeded normal breathing or blood circulation of D.H.;

**COUNT VII**

On or about August 20, 2020, DARRELL GOODLOW did knowingly touch D.H. in a rude, insolent, or angry manner resulting in bodily injury, that is: pain;

**COUNT VIII**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with S.F.; when such person was compelled by force and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill S.F.;

**COUNT IX**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with S.F.; when such person was compelled by force and/or compelled by the imminent threat

of force, and DARRELL GOODLOW threatened to kill S.F.;

**COUNT X**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with C.B.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill C.B.;

**COUNT XI**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with C.B.; when such person was compelled by force, compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill C.B.;

**COUNT XII**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with B.S.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT XIII**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with B.S.; when such person was compelled by force and/or, compelled by the imminent threat of force;

**COUNT XIV**

On or about October 1, 2020, DARRELL GOODLOW did break and enter the building or structure of S.F. and/or B.S. and/or C.B. , to-wit: a dwelling with the intent to commit a felony therein, to-wit: Rape, which is to knowingly or intentionally cause another person to perform or submit to sexual intercourse and/or other sexual conduct as defined in I.C. 35-31.5-2-221.5 with S.F. and/or B.S. and/or C.B. ; when such person was compelled by force, and/or compelled by the imminent threat of force; said act resulting in bodily injury to S.F. and/or B.S. and/or C.B., to-wit: pain;

**COUNT XV**

On or about October 1, 2020, DARRELL GOODLOW did knowingly confine S.F. without the consent of Sarndra Farley;

**COUNT XVI**

On or about October 1, 2020, DARRELL GOODLOW did knowingly confine S.F. without the consent of S.F.;

**COUNT XVII**

On or about October 20, 2020, DARRELL GOODLOW did knowingly remove C.B. by force and/or threat of force, from one place, to-wit: from the bathroom to another place, to-wit: to a bedroom;

**COUNT XVIII**

On or about October 1, 2020, DARRELL GOODLOW did communicate a threat to commit Murder, a forcible felony, to C.B., another person, with the intent that C.B. engage in conduct against her will to wit: not calling the police;

**COUNT XIX**

On or about October 1, 2020, DARRELL GOODLOW did knowingly confine C.B. without the consent of C.B.;

**COUNT XX**

On or about October 1, 2020, DARRELL GOODLOW did knowingly confine B.S. without the consent of B.S.;

**COUNT XXI**

On or about October 1, 2020, DARRELL GOODLOW did communicate a threat to commit Murder, a forcible felony, to B.S., another person, with the intent that B.S. engage in conduct against her will, to wit: not looking at DARRELL GOODLOW;

**COUNT XXII**

On or about October 1, 2020, DARRELL GOODLOW did knowingly confine B.S. without the consent of B.S.;

**COUNT XXIII**

On or about October 1, 2020, DARRELL GOODLOW did knowingly or intentionally kill a

domestic animal, a dog, without the consent of B.S., the owner of the animal;

**COUNT XXIV**

On or about October 1, 2020, DARRELL GOODLOW did knowingly touch C.B. in a rude, insolent, or angry manner, resulting in bodily injury, that is: pain;

**COUNT XXV**

On or about February 13, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with C.G.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT XXVI**

On or about February 13, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with C.G.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT XXVII**

On or about February 13, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with C.G.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT XXVIII**

On or about February 13, 2021, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with C.G.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT XXIX**

On or about February 13, 2021, DARRELL GOODLOW did break and enter the building or structure of C.G., to-wit: a dwelling; with the intent to commit a felony therein, to-wit: Rape, which is to have sexual intercourse and/or cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with C.G.; when such person was compelled by force, and/or compelled by the imminent threat of force; said act resulting in bodily injury to C.G., to-wit: pain;

**COUNT XXX**

On or about February 13, 2021, DARRELL GOODLOW did knowingly confine C.G. without the consent of C.G.;

**COUNT XXXI**

On or about February 13, 2021, DARRELL GOODLOW in a rude, insolent or angry manner, did apply pressure to the throat or neck of C.G. in a manner that impeded normal breathing or blood circulation of C.G.;

**COUNT XXXII**

On or about February 13, 2021, DARRELL GOODLOW, with the intent to arouse or satisfy the sexual desires of DARRELL GOODLOW and/or C.G., did compel C.G. to submit to a touching by force and/or imminent threat of force;

**COUNT XXXIII**

On or about February 13, 2021, DARRELL GOODLOW did knowingly touch C.G. in a rude, insolent, or angry manner, resulting in bodily injury, that is: pain;

**COUNT XXXIV**

On or about June 7, 2021, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with B.B.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill B.B.;

**COUNT XXXV**

On or about June 7, 2021, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with B.B.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill B.B.;

**COUNT XXXVI**

On or about June 7, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with B.B.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill B.B.;

**COUNT XXXVII**

On or about June 7, 2021, DARRELL GOODLOW did break and enter the building or structure of B.B., to-wit: a dwelling; with the intent to commit a felony or theft therein, to-wit: Rape, which is to knowingly or intentionally cause another person to perform or submit to sexual intercourse and/or other sexual conduct as defined in I.C. 35-31.5-2-221.5 with B.B.; when such person was compelled by force, and/or compelled by the imminent threat of force; said act resulting in bodily injury to B.B., to-wit: pain;

**COUNT XXXVIII**

On or about June 7, 2021, DARRELL GOODLOW did knowingly confine B.B. without the consent of B.B., said act resulting in bodily injury to B.B., to-wit: pain;

**COUNT XXXIX**

On or about June 7, 2021, DARRELL GOODLOW in a rude, insolent or angry manner, did knowingly obstruct the nose or mouth of B.B. in a manner that impeded normal breathing or blood circulation of B.B.;

**COUNT XL**

On or about June 28, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force, DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLI**

On or about June 28, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force, DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLII**

On or about June 28, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force, DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLIII**

On or about June 28, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with K.F.; when such person was compelled by force, and/or compelled by the

imminent threat of force, DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLIV**

On or about June 28, 2021, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force, and DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLV**

On or about June 28, 2021, DARRELL GOODLOW did break and enter the building or structure of K.F., a dwelling; with the intent to commit a felony therein, to-wit: Rape, which is to cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force, DARRELL GOODLOW being armed with, a knife, a deadly weapon;

**COUNT XLVI**

On or about June 28, 2021, DARRELL GOODLOW, while armed with a deadly weapon, to-wit: a knife, did knowingly remove K.F. by, force and/or threat of force from one place, to-wit: outside the bedroom to another place, to-wit: inside the bedroom;

**COUNT XLVII**

On or about June 28, 2021, DARRELL GOODLOW did knowingly confine K.F. without the consent of K.F., said DARRELL GOODLOW being armed with a deadly weapon, to wit: a knife;

**COUNT XLVIII**

On or about June 28, 2021, DARRELL GOODLOW in a rude, insolent or angry manner, did knowingly obstruct the nose or mouth of K.F. in a manner that impeded normal breathing or blood circulation of K.F.;

**COUNT XLIX**

On or about June 28, 2021, DARRELL GOODLOW did communicate a threat to commit Murder, a forcible felony, to K.F., another person, with the intent that K.F. engage in conduct against her will by not going to the police;

**COUNT L**

On or about June 28, 2021, DARRELL GOODLOW, with the intent to arouse or satisfy the sexual desires of DARRELL GOODLOW and/or K.F., did compel K.F. to submit to a touching by force and/or imminent threat of force;

**COUNT LI**

On or about September 8, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with S.H.; when such person was compelled by force and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill S.H.;

**COUNT LII**

On or about September 8, 2021, DARRELL GOODLOW did knowingly or intentionally cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with S.H.; when such person was compelled by force, compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill S.H.;

**COUNT LIII**

On or about September 8, 2021, DARRELL GOODLOW did knowingly or intentionally have sexual intercourse with S.H.; when such person was compelled by force and/or compelled by the imminent threat of force, and DARRELL GOODLOW threatened to kill S.H.;

**COUNT LIV**

On or about September 8, 2021, DARRELL GOODLOW did break and enter the dwelling of S.H., with the intent to commit a felony therein, to-wit: Rape, which is to cause another person to perform or submit to other sexual conduct as defined in I.C. 35-31.5-2-221.5 with K.F.; when such person was compelled by force, and/or compelled by the imminent threat of force;

**COUNT LV**

On or about September 8, 2021, DARRELL GOODLOW did knowingly confine S.H. without the consent of S.H., said act resulting in bodily injury to S.H., to-wit: pain and/or bruising;

**COUNT LVI**

On or about September 8, 2021, DARRELL GOODLOW, with the intent to arouse or satisfy the sexual desires of DARRELL GOODLOW and/or S.H., did compel S.H. to submit to a touching by force and/or imminent threat of force;

**COUNT LVII**

On or about September 8, 2021, DARRELL GOODLOW did knowingly touch S.H. in a rude, insolent, or angry manner resulting in bodily injury, that is: pain and/or redness and/or a burn; all of which is contrary to statute and against the peace and dignity of the State of Indiana.

September 20, 2021  
Date

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

/s/ Jeffrey Knoop  
Deputy Prosecuting Attorney

**State's Witnesses:**

Det. Shari Mullins, 32065, IMPD  
Det. Dustin Loeb, 20912, IMPD  
Det. Dustin Greathouse, 30722  
Det. Stacy Hinshaw, LPD  
Off. Fernando Cervantes, IMPD  
D.H.  
S.F.  
C.B.  
B.S.  
C.G.  
B.B.  
K.F.  
S.H.

**Detective Fernando Cervantes with IMPD, Detective Shari Mullins with IMPD, Stacy Hinshaw with Lawrence PD, Detective Dustin Greathouse with IMPD, and Detective Dustin Loeb with IMPD swears and affirms that he/she believes and has good cause to believe from his investigation he learned from reliable persons the following facts and attending circumstances that:**

**AUGUST 1, 2020 (IP200076288)**

On Saturday, August 1, 2020, Officer Andrew Hibschnan, with IMPD, was dispatched to 1XXX N. Bosart Avenue to investigate the report of a Home Invasion/Rape. Upon arrival, the officer came into contact with the victim, D.H. (age 60). D.H. reported that at approximately 7:00 AM, an unknown black male individual entered her home, held her at knife point and raped her. The officer requested assistance from the Sex Crimes Unit and Detective Fernando Cervantes responded to the scene.

Upon arrival to the residence, Detective Cervantes learned that D.H. reported to Officer Hibschnan that the unknown male broke the locking mechanism on the storm door, then came into the house through the front door, which was open. D.H. had been transported to Community East for medical care and a forensic exam. Detective Cervantes requested the Marion County Forensic Services (Crime Lab) and a technician arrived and processed the scene. Detective Cervantes then proceeded to Community East to speak with D.H.

Upon speaking with D.H., she reported that at approximately 7:30 AM she was getting ready to go to the grocery store. She stated she had opened the front door to let light in as she prepared to go out. She stated she then turned to grab her purse, and that's when the unknown black male pulled on the storm door, hard enough to break the lock, and walked into the house. D.H. stated that she yelled at the suspect to get out, but the suspect immediately pushed her onto a chair. She stated that she tussled with the suspect for a second, then the suspect struck her on the head and told her, "that's the end for you!"

The suspect then shut the door and returned to D.H. She stated the suspect then put a knife to her face and dragged her by the throat into the bedroom. D.H. reported that the suspect's pressure on her throat caused her to have difficulty breathing, soreness in her throat, and a raspy voice. D.H. stated that the suspect kept asking for money. D.H. said she told the suspect that there was money in her purse. D.H. stated that once in the bedroom, the male made her lay down on her bed on her stomach and told her not to move.

D.H. stated the male returned to the bedroom and this time he took her pants off and cut off her underwear with the knife. She stated he then took his clothes off and began to "grind" on her. D.H. stated that the suspect then penetrated her vagina with his penis as she laid on her stomach.

D.H. stated that the suspect covered her face with a mask the suspect wore initially. D.H. stated she could not see the suspect's face because she lost her glasses in the initial tussle with the suspect. D.H. stated she could not hear what he was doing around the house because the suspect placed several towels on her head making it difficult to hear.

D.H. stated that after the suspect raped her, he told her not to move from the bed. D.H. stated that the suspect stayed in the house for a long while. She stated that she is not sure when the suspect left, but at one point she took the towels off her face and walked to the living room and realized the suspect was gone.

A profile of an unknown male (unknown Male A) was identified in the rape kit performed on D.H.

#### **OCTOBER 1, 2020 (IP20100079)**

On October 1, 2020, Detective Shari Mullins was contacted by B152, Officer David Carney. Officer Carney advised that he was currently on scene at 1XXX N. Audubon Road with three adult females that had been raped. When Officer Carney and Officer Jeff Goodin arrived on scene, they observed that the back door of the residence was open. Officer Carney and Officer Goodin entered the residence and located S.F. (age 67) upstairs in her bedroom. Her sisters, C.B.

(age 73) and B.S. (age 74) were downstairs in the basement. Officer Carney said all three victims advised him they had been tied up and raped.

Officer Carney advised while securing the residence, he also located a small dog in the garage that had been killed, presumably by the suspect. Officer Carney advised that all three females had mobility issues and would need to be transported via ambulance to the Hospital. Detective Mullins and Detective Michelle Floyd contacted the hospitals and made arrangements for each woman to receive a forensic exam. S.F. went to Eskenazi, C.B. went to Community East, and B.S. went to St. Vincent.

Detective Floyd immediately went to 1XXX N. Audubon Road to take over the crime scene. Officer Carney had S.F. sign a consent to search form to allow detectives to search the residence and crime lab to process the scene. Once on scene at 1XXX N. Audubon Road, Detective Floyd called Crime Lab. CSU42, Mary Huffine, arrived on scene shortly thereafter and processed the scene, took photos, and collected evidence.

Detective Mullins responded to Eskenazi Hospital to take over the investigation. Once at Eskenazi, Detective Mullins spoke to S.F. who stated that around 7:00 AM she was laying in her bed when an unknown black male entered her room, grabbed her by the mouth and asked her for money. S.F. said she told

him she did not have any money. S.F. said she was unsure of everything that took place after that, and in what order they occurred. S.F. said at one point the suspect stood at the edge of her bed and threatened to kill her if she did not “suck his dick.”

S.F. said he then forced his penis inside of her mouth and forced her to perform oral sex on him. S.F. said he tied her legs together with a shirt. S.F. said he kept going from her room to the rooms where her sisters were. S.F. said at one point she heard one of her sisters screaming and thought he was going to kill her. S.F. said she attempted to call 911, but her cell phone was dead. S.F. said the suspect came back in her room and forced her to perform oral sex on him again. S.F. agreed to come into the sex crimes office for a formal statement later.

On Tuesday October 6, 2020, Detective Mullins conducted an audio recorded interview with S.F. at 4134 N. Keystone Avenue. During that interview S.F. informed Detective Mullins of the same details as listed above. S.F. also described the man as a light-skinned black male. S.F. said she thought the suspect had “nappy hair,” a mustache, chest hair, and a chin beard. S.F. said at one point the suspect forced her to place her hand on his penis and move it up and down, “jacking him off.” S.F. said he also forced her to place his penis inside of her mouth.

S.F. said the suspect placed her breast in his mouth and sucked on it. S.F. said he also rubbed her butt with his hand and said sexual things to her. S.F. said every time he would leave, he came back into her room with less clothes on than when he left. S.F. could not say exactly how many times he entered and exited her room, but believes it was at least four times.

S.F. said she tried to cooperate with everything he wanted her to do because she was afraid and he said if she didn't he would kill her and her sisters. S.F. said at one point the man told her there were three men there. S.F. believed that was meant to intimidate her more since there were three of them, referring to her and her sisters.

Detective Mullins responded to Community East Hospital on October 1, 2020, and spoke to C.B., who stated that at around 7:30AM that morning, she was in the bathroom when an unknown black male entered the bathroom, dragged her to her bedroom, and told her to lay on her back on the bed. C.B. said while he was doing something else in her room, her friend Vincent called, she said she answered the phone and the male grabbed her phone out of her hand and quickly hung it up. C.B. said he then hit her on her face with his hand and told her "I'll kill you if you call the police."

C.B. said the suspect then made her go downstairs into the basement. C.B. said once inside the basement, he located a mattress, moved it into the living area and told her once again to lay down on her back and attempted to force his penis into her anus. C.B. said his penis only entered her anus a little bit, but then he penetrated her vagina as well. C.B. said he tied her legs together but could not tell what he used to tie them. C.B. said he went back and forth between her and her sisters several times raping each of them multiple times. C.B. agreed to come to the sex crimes office later for a formal statement.

On October 5, 2020, Detective Mullins conducted an audio recorded interview with C.B. at 4134 N. Keystone Avenue. During that interview C.B. advised Detective Mullins the same details as listed above. C.B. said when she woke up that morning, she realized the back door was unlocked and possibly open. C.B. said she remembered hearing their dog barking, then screeching, but did not remember hearing the dog at any point after that. C.B. did not remember if she observed the back door was unlocked before or after she heard the dog barking. C.B. also informed Detective Mullins the unknown suspect covered the windows with blankets in her bedroom upstairs and then again in the living area downstairs. C.B. said the suspect also moved different items such as fans, heaters, blankets, and pillows from room to room.

C.B. said when he talked to her, she could barely hear him because of all the fans and heaters on, and clothes and blankets covering her. C.B. said when he raped her, she was laying on her back and he was laying on top of her. C.B. said he spread her legs really wide and placed his penis inside of her anus and vagina multiple times. C.B. said at one point, he turned her over onto her stomach and again penetrated her anus and vagina. C.B. said the suspect left her and came back several times. C.B. was unsure exactly how many times he raped her. C.B. said it was more than once, possibly five times at least.

C.B. said she cooperated and did not fight him because she was afraid and believed he would kill her if she did not. C.B. described the man as black male, in his 30's, approximately 5'9". C.B. said the way he was grabbing her and touching her made her believe he was muscular because he felt strong. C.B. described him as being smaller than average build with short hair. C.B. said at one time when he left her she looked around the room and saw red shoes and a black jacket. C.B. said there was maybe ten minutes between the time she last saw the suspect and when the police arrived.

Detective Mullins responded to St. Vincent Hospital on October 1, 2020 and spoke to B.S. who stated that around 7:30AM, she woke up to her dog barking. B.S. said that the next thing she knew a pillow case was placed over her head and someone was sitting on her asking her for money. B.S. said she told him she did

not have any money. B.S. said he left and told her not to look or he would kill her. B.S. said she stayed in bed and when he returned he placed a towel that smelled funny over her head. B.S. said she later realized he had sprayed the towel with the fire extinguisher and that is what she was smelling. B.S. said he kept threatening her that he would kill her if she looked at him. B.S. said he went in and out of her room several times. B.S. said he attempted to rape her several times, but only succeeded a few times. B.S. said the suspect tied her up using a telephone cord and her nightgown.

B.S. said the last time he left the room she saw that her sister's house phone was left in her room. B.S. said she attempted to call 911, but C.B.'s friend, Vincent, called the house at the time she picked it up so she told him to call 911 for her. B.S. agreed to come with her sisters to the office later for a formal statement.

On Tuesday October 6, 2020, Detective Mullins conducted an audio recorded interview with B.S. During that interview B.S. informed Detective Mullins the same details as listed above. B.S. also said when he was trying to rape her, he was unsuccessful because she has a prolapsed vagina and he was unable to successfully enter her vagina. B.S. said the man also attempted to place his finger inside of her vagina but was again unsuccessful and had actually placed his finger beside her vagina. B.S. could not recall exactly how many times he entered and exited her room. B.S. said he attempted to rape her at least twice.

B.S. described the male as a light skinned black male. B.S. said she did not see his face at all, but felt what she believed to be facial hair on him when he was close to her. B.S. said he was lean build. B.S. said one time he came into her room, he had black rimmed glasses that he had placed on her bedside table the last time he attempted to rape her.

B.S. said she decided early on when she first encountered the man in her room that she was going to do whatever he asked of her because she was afraid and did not want to be hurt. B.S. said she thought he would hurt her or her sisters if she did not do what he asked of her.

All three women described the male as a black male in his twenties to thirties, muscular, facial hair, around 5'9"-6'0". B.S. said she observed him wearing square black rimmed glasses, and red shoes. S.F. observed him wearing a blue and white bandana tied around his head. Detective Mullins contacted control and requested they broadcast the description of the suspect and requested anyone stopping someone matching the description to contact Detective Mullins.

After speaking to all three women, Detective Mullins then went to 1XXX N Audubon Road to assist Detective Floyd with the crime scene. Once CSU42, Mary Huffine, was finished collecting evidence from the crime scene, Detective Mullins

contacted animal control to come collect the deceased dog. AC25, Corrine Marquez, arrived on scene and collected the dog and placed a detective hold on it.

On October 2, 2020, Detective Mullins was contacted by Detective William Carter, of the IMPD, in reference to the deceased dog. Detective Carter advised Detective Mullins they had received the deceased dog and placed a hold on the dog. Detective Carter advised they were going to request an in-house exam on the dog by the vet for any obvious signs of death. Detective Carter said they would be x-raying the dog to check for any broken bones and said if there are no immediate fatal injuries located they would be requesting a full necropsy.

On October 8, 2020, Detective Carter advised Detective Mullins that the x-rays showed a broken jaw on the dog and that they were going to be sending the dog to Purdue for a full necropsy. On October 13, 2020, Detective Mullins received the final necropsy report. According to the necropsy report, the dog appeared to have died from blunt force trauma. The report states there were multiple fractures and subsequent hemorrhage into the body cavities and blood loss. The report also states the hemorrhage and edema around the area of the fractures support that it was an acute ante-mortem event.

A profile of an unknown male (unknown Male A) was identified in the rape kits performed on S.F., C.B. and B.S.

**February 13, 2021 (LP21000565)**

On February 13, 2021, Officer Lindsey Marshall, with the Lawrence Police Department, was dispatched to 6XXX E. 52nd Street for a rape that had occurred. Officer Marshall arrived and spoke with the victim C.G. (age 78). C.G. lives alone at this residence. C.G. was hesitant and scared to open the door to officers when they arrived on scene. Once C.G. opened the door, Officer Marshall could see she was very emotionally upset and shaking all over her body. C.G. had a red bandana over her forehead. Officer Marshall had her sit down and explain what happened as LFD medic 40 arrived to check C.G. for injuries.

C.G. stated she had just been raped multiple times by an unknown black man who said he was working for IPL. C.G. told Officer Marshall that sometime during the daylight hours, estimated around 3:00PM-3:30PM a black male, medium complexation, thin, but not a skinny build, standing approximately 5'9"-5'11" and in his 20's knocked on her front door. C.G. stated she opened the main door but left the storm door shut to speak with him. C.G. advised that the black male was wearing a dark hoodie, a green construction hard hat, clear construction protective glasses/goggles, and a medical style COVID face mask (possibly dark pants and tennis shoes). C.G. said the unknown black male told her he was with IPL and needed to check some electrical lines and something else inside her home.

C.G. told him no and closed the door, C.G. advised she thought he had left her property.

C.G. advised a few minutes later the same male with the green construction hat knocked on her front door again. C.G. thought he had a question this time so she opened the storm door. C.G. said as soon as she opened the storm door the male pushed the storm door completely open, he walked inside her home and pushed her to the ground making her fall onto her back. C.G. stated she heard him say something about money which she responded, "I'll give you money." C.G. advised he didn't say anything else and grabbed her and carried her to the back bedroom where he put her on her back on the bed and unclothed her, leaving her completely naked. C.G. advised the male was erect and covered his penis with a condom.

C.G. advised she was then blindfolded by a red bandana and was unable to see. C.G. stated she was penetrated with his penis vaginally during forced intercourse while she was on her back. She said this intercourse occurred multiple times. C.G. told Officer Marshall the male would leave the bedroom, change into a new condom and then return to her bedroom and rape her again. She stated this occurred four or more times. C.G. stated during the last intercourse the male told her to get on her knees which she did, and she advised he attempted to penetrate her anally which caused her pain. C.G. stated he was unable to fully penetrate her

anally and pushed her to her back where he penetrated her vaginally again. C.G. stated she thinks the male ejaculated into the condom while inside her.

C.G. stated during one of the times while he was outside of the bedroom, she peeked from underneath the blindfold, she believed the outside natural light was gone and it was dark at that point. C.G. stated he saw her peek from the blindfold and punched her once in the face, causing pain. C.G. stated he was angry and told her to shut up while placing both hands around her throat and squeezing, making it uncomfortable to breathe, but she did not lose consciousness.

C.G. advised the suspect tied her ankles to the bottom bed post prior to leaving her home. C.G. stated that he sat at the base of the bed and smoked what she thought smelled like marijuana. Officers were able to collect a cigarette butt from the bedroom. C.G. stated she does not smoke nor does she have any ash trays inside her home. Officer Marshall observed ash on pillow cases, bedding, and on the nightstand. Officer Marshall observed what appeared to be blood mixed with clear liquid on the bedding and mattress cover. The bedding, bath room mats, and hand towels were collected as evidence and placed into the LPD property room by Officers Hess and Williams.

C.G. told Officer Marshall after she was sure the male left she needed to use the restroom and noticed the floor mat in front of the sink and toilet were wet,

which was unusual. She stated she remembered the time was approximately 7:00PM or so and called the police after using the restroom. C.G. stated the male left the clothes he had taken off of her and she put them back on. As LFD Medic 40 was assessing C.G., she needed to use the restroom once more. Officer Marshall observed blood in C.G.'s underwear and collected the toilet paper she used to wipe herself, later giving it to SANE Nurse Erica Olsen through the proper chain of command.

LFD Medic 40 transported C.G. to Community Hospital North where she was examined by SANE Nurse Olsen, who also collected her underwear and pants. Officers later located footprints leading to the east side window of the house, the screen slid up and the window unlocked and slightly moved, but was unable to open completely. It appeared as if the male had walked around the home before entering the house. C.G.'s home was locked with a spare key which was also placed into LPD property room for safekeeping.

On February 19, 2021 Detective Stacey Hinshaw and Officer Michelle Stewart with Lawrence Police Department went to 6XXX E. 52nd Street to speak with the victim C.G. again. Detective Hinshaw asked C.G. to walk through her home and explain what happened the night of the rape. C.G. told Detective Hinshaw that on February 13, 2021 a young black male had come to her home and said he worked for IPL. The unknown black male knocked on her front door and

she opened the front door but kept the storm door closed. C.G. said the male appeared to be young and strong. C.G. said she opened the top part of the storm door to speak with him.

C.G. said the male said he worked for IPL and that he had another worker on the way to help him, however he had no IPL badge. The male had on a dark hooded sweatshirt and black sweatpants. The male had a green hard hat, see-through type glasses and a COVID-style mask, and he had his hood pulled over his hard hat. C.G. said she shut the door and the male then walked around the house and he came back to the door. C.G. said he knocked back on the front door and she thought he had to tell her something. C.G. said she opened her front door for the man, and he pushed her from the front entryway onto the floor in her home.

The suspect then yelled at her to get up and she said she was an old lady and would need help. The suspect then placed a red bandana over C.G.'s face so she could not see him. The suspect then got behind her and led her to the back bedroom of her home. C.G. said she thinks this all happened around 3:30PM. C.G. said she had remembered she had just eaten and had put her dishes into the sink. C.G. said that it is hard to remember the exact order of how things happened.

C.G. said that once they were in the bedroom the male had her lay on the bed and he sat on the edge of her bed. C.G. said she could see his undershirt from

under her blindfold. It was a white shirt with no sleeves, and reminded her of what her grandpa used to wear. C.G. told the male that God loved him, but he hates sinners. She said this made the suspect angry and he struck her in the face with his fist, causing pain to her face.

C.G. said the suspect then pulled down her pants and began to have sex with her. C.G. said she remembers the male at one point whispering in the ear saying he was going to “stretch her pussy.” The male also told her he was going to go change the condom several times during this incident and would go the bathroom and change into another condom and come back. At one point the suspect attempted to turn her over on her stomach and place his penis in her anus, however, he could not fit it in.

C.G. said at some time he asked her for money. The suspect also smoked a cigarette during the incident. C.G. said she tried to hide the lighter the male used to light it. C.G. said at some point the male also turned on her air conditioner and placed her humidifier in her home in the bedroom. The male also spanked her bottom at one point and told her she had a nice bottom. C.G. said at one point because she would not “shut up,” the male placed his hands around her neck to strangle her and told her he would knock her out if she did not “shut up.”

C.G. told Detective Hinshaw the male smelled clean and reminded her of a fabric softener smell possibly. C.G. did not smell alcohol. C.G. said the suspect then tied her legs up to end of her bed with her clothing. C.G. said the suspect was at the home for a long time. C.G. said she had to use the restroom and could no longer hear him so she untied herself and went to the restroom and called the police. C.G. is unsure how many times he raped her. She said it could be five or more. C.G. is unsure how long the suspect was at her home, but it was from when it was light out until the sun had gone down.

On February 22, 2021 Detective Hinshaw received a report from Marion County Crime Lab. The DNA found on the cigarette butt left behind on scene matched DNA from previously developed cases from Marion County Crime Lab. The unknown male (unknown Male A) that was previously developed from cases IP20100079 and IP20076288 was found to be consistent with being a contributor to mixed DNA profile that was obtained from Item 4 (the cigarette butt) in case LP21000565. A profile of unknown male A was also found in the rape kit performed on C.G.

**June 7, 2021 (IP210056895)**

On Monday June 7, 2021, Detective Shari Mullins received a page to contact B349, Officer Austin Crowe. When Detective Mullins spoke to Officer Crowe, he

informed her that he was currently on scene with B.B. (age 69) at her residence located at 2XXX Lesley Avenue. According to Officer Crowe, B.B. told him an unknown black male had knocked on her door and forced himself in when she turned around to get her hearing aids. B.B. further told him the unknown black male forced her to lay down face first on her bed and raped her multiple times.

Officer Crowe said B.B. had visible injuries to her face and that he had observed blood in her bedroom. Officer Crowe said B.B. was getting loaded in an ambulance and was going to be transported to Community East to be checked out and receive a forensic exam. Detective Mullins advised Officer Crowe to stand by at the residence to secure the crime scene while she immediately responded to Community East to take over the investigation.

Once at Community East, Detective Mullins spoke to B.B. B.B. had trouble hearing and informed Detective Mullins that she usually requires hearing aids to communicate efficiently. B.B. told Detective Mullins that the man that attacked her took her hearing aids away from her during the assault so she could not hear very well. Detective Mullins asked B.B. to explain what happened. B.B. informed her that around 7:20PM on June 6, 2021, a black male knocked on her door. B.B. said when she answered the door, the man was wearing a bandana around his face and had tools and equipment that made her think he was a tree trimmer.

B.B. said she could not hear what he was saying to her, so she told him to hold on while she grabbed her hearing aids. B.B. said the man then pushed his way into the house and grabbed her by the arms and took her to her bedroom. B.B. said he told her to lay down face first on the bed and not to look at him. B.B. said he threatened he would kill her if she looked at him so she did not try to see what he looked like. B.B. said once he got her into her room, he left so she got up and tried to lock her bedroom door. B.B. said he came back in there before she successfully locked it and pushed her down onto the bed and forced his penis inside her anus.

B.B. said she pleaded with him to stop but he kept telling her to “shut up.” B.B. said he would place his hands over her eyes and mouth making it hard to breathe. B.B. said he would come and go from the bedroom raping her several times over the next seven hours. B.B. could not say for sure how many times he raped her. B.B. said he kept telling her he was about to leave, but then he would come back and rape her again. B.B. said the last time he left she remembers looking at the clock and seeing that it was 2:20AM. B.B. said she waited twenty minutes silently in her bedroom before calling the police to be sure that he was actually gone. B.B. signed a consent to search form allowing Detective Mullins to search the residence for evidence. B.B. agreed to have a forensic exam once she was medically cleared to do so. On June 7, 2021, B.B. went to Community East

Hospital Center of Hope and had a forensic sexual assault exam completed by SANE's Abby Thompson and Jackie Esparza.

Detective Mullins then went to 2XXX Lesley Avenue and contacted Crime Lab to process the scene. CSU 11, Jami Kelly, arrived on scene shortly later to collect evidence, swab for DNA, and dust for prints. On June 8, 2021 Detective Mullins submitted for the DNA analysis be rushed to compare DNA from B.B.'s rape kit to previous DNA under Case number's IP20100079, IP20076288, LP21000565, due to similarities in the details of the incidents. On June 10, 2021, Detective Mullins received preliminary results from the crime lab advising the DNA profile from the unknown male individual in this investigation matches the DNA profiles from the unknown male individual in the sexual assaults from IP20076288, IP20100079, and LP21000565.

Detective Mullins made several attempts to contact B.B. to come in for a formal statement. Detective Mullins eventually spoke with B.B.'s son, William Blackwell. William informed Detective Mullins that his mother had relocated out of state and an additional statement of B.B. was not completed.

**June 28, 2021 (IP210064869)**

On June 28, 2021 IMPD Officer Ryan Russell was dispatched to 1XXX N. Harbison Avenue on a rape investigation. Upon arrival Officer Russell spoke with the victim, K.F. (age 65), who stated she had been sexually assaulted by an unknown black male at her home at 1XXX Campbell Avenue. Officer Russell requested to speak with a Sex Crimes Detective and Detective Dustin Greathouse received a page to call Officer Russell. After speaking with Officer Russell and learning the above information, arrangements were made with Eskenazi COH for K.F. to be seen for a forensic exam. Detective Greathouse responded to Eskenazi to speak with K.F. and East District Officers responded to 1XXX Campbell Avenue to secure the crime scene.

Upon arrival to Eskenazi, Detective Greathouse spoke with K.F. Present during this conversation was Forensic Nurse Michelle Wilbrandt. K.F. stated that an unknown black male came to K.F.'s back door on June 27, 2021 at approximately 3:00PM. The man knocked on the door and he told her he needed her to sign some paperwork so he could remove some wood from her back yard. K.F. spoke with the man but didn't open the door for him. K.F. called her cousin, Carol Richardson, who lives down the street in the same apartment community to tell her about the man that knocked on her door.

Detective Greathouse later spoke with Carol who confirmed K.F. called and told her about the man that knocked on her door. Carol showed Detective

Greathouse the call she received from K.F. at 3:23PM. K.F. said the suspect came back approximately five minutes after knocking on the door the first time and forced entry into the apartment. The suspect grabbed K.F. and took her to her bedroom where he blindfolded her with an unknown material and wrapped her face in clear packing tape.

The suspect then vaginally raped K.F. numerous times over a period of thirteen hours. K.F. said the suspect was armed with a knife and told her he would kill her if she told anyone. The suspect left the home at approximately 4:00AM on June 28, 2021. K.F. immediately left her home and drove herself to her son's home where she told him what happened, and he called 911. K.F. signed a consent to search form for her home at 1XXX Campbell while at Eskenazi.

After leaving the hospital, Detective Greathouse went to 1XXX Campbell Avenue and requested Crime Lab to process the crime scene. Crime Lab Supervisor Christine Hagan responded to the scene and collected several items of possible evidence to be processed. One of the items collected was a cigarette butt with the word "Golden" written on it. The scene was also processed for DNA and prints.

On June 30, 2021 K.F. came to the Sex Crimes Office and provided a recorded statement. On June 27, 2021, a man wearing a black COVID-style mask

and a baseball cap came to the back door of K.F.'s apartment and knocked. K.F. told the suspect the back door wouldn't open. K.F. talked to the suspect through a window and he said something to her about the trash in the backyard and that she needed to sign off on it. K.F. told the suspect she couldn't sign off on anything to do with the apartments and he would need to talk with the manager. K.F. said that he left, and she called the manager, Carol Richardson, who also happens to be K.F.'s cousin and told her what happened.

When K.F. got off the phone she started walking into the kitchen when she heard a loud crash coming from the back of her apartment. K.F. turned around and saw the same man that was at her back door a few minutes earlier climbing into her apartment through a window. K.F. said she was in shock and watched him come into her apartment. The suspect was armed with a brown handled cooking knife. K.F. then ran to her front door, unlocked it, and started to open the door. The man had come up from behind her and tackled her. The suspect grabbed K.F. by her arm and was squeezing it. He put his hand over K.F.'s mouth, and she said she wasn't able to breathe.

The man told K.F. "I could snap your neck." K.F. told him she couldn't breathe, and he took his hand away from her mouth. The man guided K.F. to her bedroom and told her to sit on the bed and look at the wall. The suspect left the room and then came back and put two masks on her. Over the next several hours

the man put several more masks over K.F.'s face. K.F. described the suspect putting duct tape or packing tape around the masks and taped the masks to her face. K.F. said the suspect then raped her multiple times for the next twelve hours.

When the suspect first tackled K.F. he told her, "we don't want to hurt you, we just want the money. I'm going to let some of my friends in and they are going to sit in here." K.F. said she could hear the TV on in the living room but described it as being quiet in the apartment and she didn't hear any other voices. The suspect would come in and out of the room and say, "when we are finished, we'll leave." The man also said, "we are MS-13," "We've got people everywhere, if you go to the police, we'll kill you," and "We've got black babies everywhere." K.F. said the man told her "Big John was the leader and he just got out of prison and he will kill you."

K.F. told the suspect she needed to use the bathroom, so he took her to the bathroom. The rapes started after the suspect took K.F. to the bathroom. K.F. heard him moving around a lot and it sounded like he was going through drawers in the bedroom. The suspect moved an upright oscillating fan from the living room to the bedroom. K.F. described being raped and then the man would leave and come back again and rape her again. During some of the rapes the suspect would tell K.F. "I could choke you out." During one of the rapes K.F. described the suspect as being very gentle and said he started to rub lotion on her legs and feet.

K.F. said the suspect turned on the TV in her room and turned it up very loud and left it on.

Detective Greathouse asked K.F. to tell him more about the suspect that raped her. K.F. said the man just moaned like he was enjoying himself but didn't say much. The man had a smell about him, but K.F. couldn't describe what the smell was. K.F. said the smell was like a chemical smell. K.F. said she smelled smoke from a cigarette in her bedroom. K.F. said it sounded like the suspect was disguising his voice. When asked about how old the man was, K.F. said he was in his 30's or 40's.

K.F. described being vaginally raped by the suspect and he attempted to anally rape her, but his penis was not erect enough to penetrate her anus. K.F. said the suspect's penis was never completely erect during the rapes. K.F. described feeling the suspect ejaculate inside her vagina once and then another time after he pulled his penis out of her vagina K.F. felt the ejaculate on her leg. Detective Greathouse asked K.F. if she ever touched the suspect with her hands and she said yes. The man forced K.F. to touch his penis with her hand and she described the man forcing her to give him a "hand job." K.F. said she was worried about getting a venereal disease from the man because she felt skin tags all over his penis.

After being raped for the final time, the suspect came into the bedroom and wiped K.F. off with a wet cloth. The suspect said, “we’re finished, I’m going to take the mask off.” When the mask was taken off the man threw clothing over K.F.’s face. The suspect said he was going to come back and tap her shoulder and after he did that, she would be free. The suspect never came back to tap on her shoulder. K.F. lay in her room for a while and finally got up and left her room. K.F. went to the bathroom and used the bathroom. K.F. didn’t notice anything missing from her apartment. K.F. believed the suspect took her phone because it wasn’t where she left it. K.F. left her apartment and drove to her son’s house where the police were called.

On July 2, 2021 Detective Greathouse received a report from Marion County Crime Lab, the DNA found in the sexual assault kit from K.F. matches DNA from previously developed cases from Marion County Crime Lab. The unknown male profile that was previously developed from cases IP20100079, IP20076288, LP21000565 and IP210056895 was found to be consistent with the unknown Male A DNA profile found in K.F.’s sexual assault kit.

**September 8, 2021 (IP210092765)**

On September 8, 2021 at 8:35 AM IMPD Officer David Carney was dispatched to 1XXX Campbell Avenue on a report of a rape. Officer Carney arrived and spoke to the victim, S.H. (age 66), who said she was sexually assaulted by an unknown male in her home. Detective Dustin Loeb responded to the scene and took over the investigation.

S.H. said she fell asleep on her couch somewhere between 1:00 AM and 3:00 AM. She woke up a short time later to a male grabbing her by her ponytail and pulling her off the couch. The suspect pulled her into the bathroom and struck her several times. He pulled her into the bedroom and told her to take her clothes off. He was wearing a cover over his face and eventually covered her face with a t-shirt, towel, or some type of cloth.

The male forced oral sex and vaginally raped her 7-8 times in the bedroom. S.H. said there was a fan in the living room that was moved to her bedroom by the suspect and placed next to the bed. At some point, she asked for water and the suspect got her a bottle of water from the kitchen and a carton of orange juice. S.H. said the man smoked cigarettes while he was there and burned her back with one.

S.H. said the suspect cleaned her vagina with something and left the room. She waited for a while, got up from the bed, and tried to leave the room. The suspect came in yelling at her so she got back in bed and covered her face back up.

She waited for what she believed to be an hour, put a shirt on, and ran from the room and her apartment. She went to a neighbor's house and called the police after he gave her a pair of pants to put on. S.H. reported the bed feeling wet when she got up to run out. S.H. said she never saw the suspect due to her face or his face being covered. She touched his hair and believes he is either Black or Hispanic. S.H. said the suspect talked with an accent but she thinks it was fake. S.H. was transported to Community East hospital by Victims Assistance for a forensic examination and the collection of a sexual assault kit.

Crime Lab Technician Lakota Black responded to process the crime scene. Black collected evidence from the crime scene including a fingerprint from the base of an oscillating floor fan that was moved from the living room to the bedroom by the suspect. Black rushed processing of the recovered print through The IMPD Latent Print Unit. At 5:50 PM, Detective Loeb received an email notification of a positive identification from the print recovered from the base of the fan. The print returned to B/M Darrell Goodlow with a Gallery number of 600043. Detective Loeb checked that gallery number and located a Darrell Goodlow with date of birth of 7/18/84. Goodlow's address through Indiana BMV is 1XXX Campbell Avenue.

Detective Loeb contacted S.H. and asked her when the fan was last moved. S.H. said the fan had been located in the living room without being moved for at

least a year and a half prior to it being moved by the suspect. She has never loaned the fan to anyone. She has not had a visitor in her apartment since her nephew spent the night a year ago. S.H. said she has not had any work done in her apartment since she had a plumber come in over a year ago. S.H. said she has not had any of her neighbors, their family members, or friends of her neighbors in her apartment.

Sgt. Shawn Looper and Sgt. Jonathan Haynes with IMPD were attempting to locate Darrell Goodlow and the following occurred: Sgt. Haynes said S.H. stopped them as they were walking into the common grass area from the street in the neighborhood. S.H. asked if they would go inside of her apartment with her so she could get some items from her residence since she was not staying there and was scared to go inside by herself. She kept saying she needed to talk to the detective to figure out what “they” found out.

S.H. kept asking questions about the fan that she was asked about on the previous night by the detective. To try and get her mind off the fan, Sgt. Haynes and Looper began to speak with her about her neighbors and said they were there to canvass for people that might not have been home the day prior. She began to name each of her neighbors, most of them by name, and pointed out which neighbors were newer residents. Sgt. Haynes asked her if they do anything

together as neighbors in the common area. She said she drinks with Carmen in the apartment across from her.

Sgt. Haynes asked her if all the neighbors live by themselves or if there were additional people that live in any of the apartments. She said most live by themselves, but Carmen's son lives with her on and off. She said she drinks with Carmen and her son. Sgt. Haynes asked whether with Carmen and Carmen's son ever come to her apartment to drink. She stated they don't come to her apartment, but they have brought her home when she was intoxicated. She said the last time was about a month ago when Carmen, Carmen's son, and an unknown cousin brought her home.

Sgt. Haynes asked if she knew the name of Carmen's son or the cousin. She said the son's name was Darrell, but she did not know the cousin's name. Sgt. Haynes asked her if any of the other neighbors that she named ever came over to help her with anything. She said no. She mentioned Darrell has hit on her before but she knows it wasn't him that did this because she believes the suspect was more muscular than Darrell. Though S.H. mentioned that Darrell could not be the suspect, she described the house as being completely dark and said her face was covered which prevented her from seeing the suspect during the assault. S.H. also described being struck in the face area several times during the beginning of the assault and the suspect using a fake accent when he talked to her.

On September 17, 2021, Detective Dustin Loeb conducted a formal interview of S.H. S.H. said she went to sleep around 1:00 or 2:00 AM on September 8, 2021, after watching the Nanny and another show. S.H. said she had a toothache so she went to sleep. She woke up to an unknown male yanking her off the couch by her hair and dragging and walking her to the bathroom. S.H. said she got a cut on her arm that she believes happened in the bathroom. S.H. said the man pushed her into the bedroom, knocked all the clothes off the bed, and raped her.

S.H. said the suspect was tall, muscular, and very strong. She touched his waist and realized how muscular he was. S.H. said the suspect kept having sex with her and wouldn't stop. She asked for water and he went and got her a bottle of water. She told him she was hot and he left the room and returned with a fan. S.H. said she asked him for a cigarette and he gave her a cigarette that seemed to be longer than her brand of cigarette. S.H. said she could not see because it was dark in her room and because the suspect kept covering her face up.

S.H. said she normally sleeps with all the lights on in her apartment. S.H. said the lights were on in all of the rooms of her apartment when she went to sleep. When she woke up to the suspect yanking her off the couch, she does not remember if the lights were on or off, but she knows the lights in the bedroom were off. S.H. said she was so startled when she woke up that there seems to be a "dead part" that she does not remember. The window was also covered with a

blanket that belonged to her. S.H. said the suspect covered her face as soon as she got in the bedroom. S.H. said she never saw the suspect because he kept her face covered or shielded his face from her. S.H. said she could not see the color of his skin because the room was so dark and her face was covered.

S.H. said she was raped in the bedroom at least eight or nine times, perhaps more. He would put his penis in her vagina and it would get soft. S.H. said the suspect gave her a hickey on her neck. Detective Loeb observed a bruise that appeared to be healing on the left side of S.H.'s neck. S.H. said she was vaginally raped and the suspect forced her to perform oral sex on him. S.H. said the suspect put his penis in her mouth and the next morning she felt something crusty in her mouth like he might have ejaculated in her mouth. S.H. said she does not know if he used a condom because she has never had sex with anyone that used a condom. She said her vagina was dry and it was not pleasurable for her at all. She said it may have been pleasurable for him, but it was not for her.

S.H. said the suspect told her that he would kill her or strangle her if she did not do what she was told to do. He told her to lay on her left side on the bed and face the wall. He covered her face up, but also wanted her to face the wall so that she could not see him. S.H. said the suspect kept whispering things to her that she could not understand. The suspect had an accent and she did not believe he was from the United States.

S.H. described the fan moved by the suspect as a white fan on a pedestal with push buttons to control the speed. The fan is normally kept in the living room next to the bathroom door. S.H. said she keeps the fan pointed on her when she sleeps because she has to have the fan on to sleep. S.H. said the fan has not been moved since she put it there. The most she would have done is move it six inches to change the direction so that it was actually on her depending on her position on the couch. S.H. said she was the one that put the fan in the living room and no one other than her has ever moved the fan. S.H. said she is a loner and hardly ever gets company. She feels that is why the suspect picked her.

S.H. said the suspect moved the fan from the living room to the side of the bed. She could not see him move the fan but saw that it had been moved. He unplugged her lamp to plug the fan in and placed the fan so that it was pointing at them. She said they were both sweating really badly during the assault. S.H. said she was laying on the bed with her head at the head of the bed and her feet where they should be at the foot of the bed. S.H. said all of the rapes occurred in the bedroom. S.H. clarified that she did not count the actual number of times that she was raped. S.H. said she was sitting up on the bed when she was forced to perform oral sex on the suspect. She does not remember how he was positioned when he forced her to perform oral sex but thinks he was “on his legs.”

S.H. said the suspect kept leaving from the bedroom and coming back in but she does not know what he was doing. She could not see because he had her face covered up. She would try to look but had to hurry and hide because he would come back to the bedroom. S.H. said the cigarettes he brought to her seemed to be longer than her normal brand. The suspect smoked cigarettes while he was there and she has no idea where he was putting them out. S.H. said he made her pee in a litter box twice. She could not believe he knew where the litter boxes were. He made her use the bedroom litter box which was right next to the bed.

S.H. said the suspect kept moving his penis around like he did not know where to put it. She said she has been with inexperienced men before and he seemed inexperienced. S.H. said she was afraid he was going to put his penis “up her butt.” She was afraid because it would hurt. The male was too close to her anus. He never put his penis in her anus because she kept moving but she does not know if he was trying to.

S.H. said he took her cigarettes from her when she was finished but she does not know what he was doing with them. At one point, she was lying down and a “fire fell and burned her.” A cigarette butt or something fell on the bed and S.H. ended up laying on it. She said she didn’t know if the suspect was intentionally burning her or what was going on. She told him it burned and believes he put it out because she did not smell smoke.

S.H. said it was very dark and her face was covered so she does not know if he actually put the fire out. She said she felt things because she could not see anything. At one point she touched the suspect's hair and it was very curly. She described them as not big curls but not small curls. She thought he had some type of product in his hair because it was wet. She said it could have been because he was sweating.

S.H. said she would not have had a condom in her house so she has no idea where the condom recovered from the scene would have come from. The last time she had consensual sex was a couple of years ago. She said people do not come over to her house except for people from Humana. Detective Loeb asked S.H. if she hangs out with or drinks with any of her neighbors. S.H. said she drinks with Carmen Dyson and attends parties at her apartment. S.H. said she went to a party at Carmen's a month or two ago. Carmen, her son Darrell, and a cousin had to help her get home from the party.

S.H. said Carmen got in her face and said she was going to kill her on September 16, 2021. S.H. does not remember exactly what Carmen said but felt like she was being threatened. S.H. said Carmen was obviously upset with her about Darrell and thinks that she told the police something about him but she did not say anything. S.H. said Darrell seems like a sweet guy and normally hangs out with his cousin.

S.H. said she had Southern Comfort the night of the party at Carmen's. Darrell, Carmen, and the cousin helped her get home. S.H. said she was embarrassed by how drunk she was and said she cannot drink like that ever again. S.H. said they locked up her apartment after they got her home. Darrell has never come over to hang out but he has wanted to. S.H. said he wanted to come over and smoke marijuana but she told him no because she did not want any problems. S.H. said he has a girlfriend and she did not want problems with her. She knows that he is dating a white woman. S.H. said Darrell has never really hit on her. She said she is older than him. S.H. said she had a full forensic examination at the Community East Center of Hope after the assault.

S.H. said she has only talked to Carmen once since the incident happened and that was when Carmen yelled at her and threatened her. S.H. said she has never had sex with Darrell and he has never tried to have sex with her. She said she does not believe we would find anything related to Darrell at her apartment unless Darrell is the person that raped her. S.H. said she knows it was not Darrell because the suspect's voice was different and because Darrell has dreadlocks. She said the suspect whispered a lot and had an accent. She does not know what the accent was but she knows it is from somewhere else. S.H. said the suspect was taller than Darrell. She has not seen Darrell since the party that she went to at Carmen's a month ago. She has not seen him in a while but remembers him having long

dreads. S.H. clarified that she has not had consensual sex with anyone for approximately two years.

S.H. has two entry doors to her apartment. She was not locking the deadbolt of the front door before this incident happened. S.H. said her neighbor was raped recently and S.H. has been afraid since that happened. The back door opens up to a patio with four cat dishes and two geranium plants on it. She has about ten feet of yard and high bushes. Behind the bushes is more yard and a tall privacy fence. S.H. said you cannot see around or over the bushes. S.H. said she is not sure if she locked the patio door. S.H. said the built-in lock did not work so she used a stick to secure it. She is the only person that would lock the door. S.H. was not sure how the suspect gained entry to her home.

Detective Loeb asked S.H. to go back to the rape and explain how she was able to get away. S.H. said the suspect told her it was over but he had sex with her again. S.H. said she looked at the window and could see a little daylight. She started to get up but she saw a shadow so she lay back down. She decided to wait for about an hour and then try to leave. S.H. said after about an hour, she grabbed a flannel shirt from the floor next to the bed and ran out of the room. S.H. said she does not know if the door to her apartment was unlocked. She ran out the front door from her apartment to Carmen's and knocked on the door. She did not get an answer at Carmen's so she went to Larry's house. Larry called the police, gave her

pants to put on, and gave her two beers to help her calm down and get the crusty stuff out of her mouth.

Detective Loeb asked S.H. if there was anything that she remembers that they had not covered. S.H. removed a notebook from her purse and stated the following: He kept telling her not to talk or he would kill her if she kept talking. S.H. said she was asking him about the thing on her face because she could not breathe. The male had a wife beater t-shirt on. He forcefully grabbed her by her ponytail and took her to the bathroom and she could feel blood coming from the corner of her mouth. She said, "please don't hurt me". When they got to the bedroom, he told her to take her clothes off. He would not let her look at him. He kept putting her in different positions sexually. He had curly short hair with something like grease in it. He kept stuffing clothes or something over her face. He brought her water and cigarettes. She found a lighter that she doesn't recognize on a table next to the bed. S.H. said she believes the lighter belongs to the male but she moved it when she found it. She believes it would have her fingerprints and the suspect's fingerprints on it.

After the interview, S.H. admitted that Darrell had hit on her before and expressed that he wanted to have sex with her. S.H. said she was afraid to say that because she did not want Carmen to be upset with her.

On September 13, 2021 at 12:27 PM, Detective Greathouse received a phone call from his victim, K.F. (assaulted on June 28, 2021), stating that S.H. has been talking to her about what happened. During the conversation K.F. asked Detective Greathouse if he had looked into any of the neighbors. She specifically asked about Darrell, who lives across from her with his mother Carmen Dyson. Detective Greathouse asked her why he should look into Darrell. K.F. said because Darrell fits the physical description of the person that assaulted her and approximately three years ago Darrell sent a text to K.F. from 317-2XX-XXXX, which she knew to be Carmen's phone number. The text stated, "I want to fuck you" and made comments about wanting to please her sexually. K.F. also sent Detective Greathouse a message stating the following: "I forgot to tell you that Darrell also called [S.H.] and did sex talk and wanted to come to her house and have sex. I don't know if he called her or texted her but she told me about it. You might have that detective ask her about it."

Detective Loeb applied for and was granted a buccal warrant on September 14, 2021 under cause number 49D20-2109-MC-028456 by Judge Jennifer Haley. On September 15, 2021, Detective Loeb requested and was granted a limited search warrant for 1XXX Campbell Avenue for the purpose of searching for Darrell Goodlow to serve the buccal warrant. The warrant was granted by Judge Travis Sandifur under cause number 49D19-2109-MC-028607. On September 16,

2021, Detective Dustin Loeb and Dustin Greathouse went to 1XXX Campbell Ave and served the buccal warrant on Darrell Goodlow with the assistance of IMPD officers.

Detective Loeb and Greathouse transported the buccal swab kit to the Crime Lab for DNA analysis. Later that night Detective Loeb was notified by Tammy Murphy with the Marion County Crime Lab that preliminary results of the DNA analysis on the buccal standard from Darrell Goodlow, indicated that the DNA Profile of the unknown Male Individual A from IP20076288, IP 20100079, LP21000565, IP210056895, IP210064869 and IP210092765 (the above cases in this probable cause affidavit) matched the DNA profile of Darrell Goodlow.

On September 16, 2021, a search warrant was requested and granted under cause number 49D24-2109-MC-028796 to search the residence for evidence related to these incidents. The search warrant was executed at 1XXX Campbell Avenue on September 17, 2021 by IMPD and LPD officers. Officer David Carney was in the rear of the residence while the apartment was being searched. Officer Carney advised Detective Greathouse of noises coming from the attic. IMPD Officers began searching the attic but did not find anyone.

Simultaneously, Officer Carney contacted Detective Greathouse and told him that someone was looking out of the blinds at the apartment next to 1XXX

which is 1XXX Campbell. Shortly after, Darrell Goodlow walked out of the front door of 1XXX Campbell and was taken into custody and transported to 4134 N. Keystone by Detective Greathouse with Detective Loeb following. Officers believe Goodlow had entered the attic from 1XXX and crossed over to 1XXX because the attic space between the apartments was open. During the search of 1XXX Campbell, Detective Hinshaw located an orange traffic safety vest in a basket full of men's clothing. There was a plastic grocery bag full of cut off dreadlocks as well. Detective Hinshaw also located a dark colored shirt and pants, and a COVID-style facemask.

Detective Greathouse read Goodlow the advice of rights form at the Sex Crimes Office. Goodlow declined making a statement without an attorney present. Goodlow was then placed under arrest and transported to the Marion County Jail. Goodlow's phone, a Boost smartphone in a black case, was collected by Detective Loeb and transported to the IMPD property room to be held pending a search warrant.