CASE NUMBER: 49D27-2405-MR-012328 FILED: 5/2/2024 STATE OF INDIANA IN THE MARION SUPERIOR COURT **MARION COUNTY, ss:** CRIMINAL DIVISION Cause No: 49D27 STATE OF INDIANA) **INFORMATION**) **COUNT I**) VS. **MURDER** I.C. 35-42-1-1(2) A FELONY **CHAD MARTIN W/Male COUNT II** DOB 1/9/1991 ROBBERY RESULTING IN SERIOUS

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

BODILY INJURY I.C. 35-42-5-1(a)(1) A LEVEL 2 FELONY

COUNT I

On or about April 29, 2024, CHAD MARTIN, did kill another human being, to wit: Shane Coffman; while committing robbery, which is to knowingly take property from another person or the presence of another person by using force;

COUNT II

On or about April 29, 2024, CHAD MARTIN did knowingly take a motor vehicle from Shane Coffman or the presence of Shane Coffman, by using force by physically preventing Shane Coffman from regaining control of his motor vehicle or by ramming Shane Coffman into a bollard; said act resulting in serious bodily injury, to wit: a torn liver or broken neck or broken pelvis or broken hip;

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

May 2, 2024
Date

RYAN MEARS

Marion County Prosecutor 19th Judicial Circuit

/s/ Matthew Bavender
Matthew Bavender, #25478-48
Deputy Prosecuting Attorney

State's Witnesses:

ADAM BANDY

GIANA BENDER

JOHN BURRELLO

MICHAEL CONDON

MICHAEL DUKE

DEREK EISMAN

ROBERT FEKKES

JONATHAN FRANTSI

BRET HASSE

ANTHONY JOHNSON

DUSTIN KEEDY

SAMUEL KREIGH

ANGELICA LEON

MATTHEW MELKEY

BRIAN WILLS

John Cavanaugh M.D.

KC

GP

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Anthony D. Johnson swears (affirms) that:

On April 29, 2024, at approximately 2:29pm, officers with the Indianapolis Metropolitan Police Department were dispatched to the Arco gas station located at 2701 English Avenue reference a person down. Officer Bret Hasse was in the area and heard someone calling for help from the Arco lot and responded. He learned the person down was a victim of a carjacking with injury. Ofc. Kreigh arrived shortly after and spoke with the victim identified as Shane Coffman by ID he had with him. Ofc. Kreigh reports Mr. Coffman was struggling to breath and Mr. Coffman stated that while he was inside the Arco gas station someone stole his car. Mr. Coffman stated he left the car running with the keys in it and went inside. Mr. Coffman then came back outside to the suspect he described as a white male, blue eyes, curly hair in the driver seat of his blue Toyota Camry. Mr. Coffman stated he tried to pull the suspect out of the vehicle while it was still stationary. The suspect then drove off dragging him approximately 30 yards through the gas station parking lot. Mr. Coffman's vehicle is a 2007 Toyota sedan bearing Indiana Plate

The vehicle description was entered into the CAD history.

Videos obtained from the Arco station and the Florance Fay apartment building on the east side of S. Rural St. show Mr. Coffman arrive with the vehicle and park in front of the business doors and go inside. Nearly thirty minutes pass when a white male in a dark gray unzipped hoodie, tan camo shorts and black shoes can be seen walking northwest bound on Southeastern Ave, crossing S. Rural St, walking across the Arco lot and to the parked car where he opened the driver's door, got inside, and closed the door. Mr. Coffman immediately ran from the building to the car. As the subject was already behind the wheel of the car, Mr. Coffman reached inside the vehicle toward the man in the driver's seat. At that time the vehicle accelerated heavily in

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

/s/ Anthony D. Johnson

AFFIANT

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From: Anthony D. Johnson

reverse from the front of the building and through the lot towards Rural St. Mr. Coffman is

visibly dragged as he hangs from the driver's window and his left arm appearing stuck inside. As

the vehicle fled in reverse, it appears to swerve towards the farthest fuel pump from the building.

Mr. Coffman appears to be struck against the protective barriers of a pump island, or the pump

itself, causing him to fall from the window of the vehicle to the ground. It appears the driver's

front tire rolls over Mr. Coffman's body after he fell to the ground. The driver of the vehicle did

not stop and continued out of the lot and fled southbound on S. Rural St. from the location.

Shane Coffman was transported to Eskenazi Hospital in critical condition where he succumbed

to his injuries at 3:20pm.

Speedway PD Officer Adam Bandy advised he checked county wide runs on his in-car computer

and observed an active run being investigated by IMPD involving the stolen 2007 Toyota Camry

. Ofc. Bandy checked a license plate reader (LPR) program and observed bearing plate

the vehicle exited W/B I-70 at Holt Rd at 2:36pm. He drove to the area of Cossell Rd and Grande

where he parked at Allison transmission to observe traffic. He then checked the LPR again and

saw the Toyota Camry was E/B W. Vermont St at N. Lynhurst Dr. at 2:47pm. Shortly thereafter,

he saw the Toyota drive by his location.

He followed the vehicle for a short time and confirmed the license plate to be. When

Assisting officers arrived Ofc. Bandy initiated a traffic stop at 2:56pm. The vehicle stopped and

the driver was taken into custody at West 10th Street and Holt Road. The driver was identified as

Chad Martin, white male, DOB: 01/09/1991. Through a BMV check, the vehicle was found to be

registered to Shane Coffman.

Ofc. Bandy advised although Chad Martin was read the Miranda Warning, he was not

questioned. Martin stated to the officers present, "This is my vehicle" and "Just got my vehicle

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back from a guy". Without being asked questions, Martin told Speedway officers on BWC, "The

car was stolen from me, that's how I had the keys". Martin also stated, "Sir, I told the guy this is

my car and I want it back."

The clothing worn by Chad Martin was a grey hooded jacket/sweater, tan camouflage cargo

shorts, and black shoes which matched that of the male in the Arco video getting into the 2007

Toyota Camry sedan.

Chad Martin was transported by Officer Bandy to the IMPD homicide office located in the City

County Building at 50 North Alabama Street.

Chad Martin was read the Miranda Warning from the form by Det. Johnson. Martin was then

provided the form to read for himself, as he stated he could read and understand the English

language. Mr. Martin signed the form and agreed to speak with Det. Johnson.

When asked about the fact he was stopped by Speedway Police he advised the car was his.

Martin stated he may be a victim of identity fraud and that someone may be buying cars in his

name. He entered a car into the "Melissa App" and the app advised the car was in his name, so

he drove it away. Based on review of available video, Martin never used his phone while visible

in the lot of the Arco station or while walking along the streets nearby. Martin denied hurting

anyone on this day and denies harming anyone in his life. Det Johnson then clarified that he did

not hurt anyone today, either intentionally or unintentionally or because of his actions, and

Martin stated he hopes not. He went on to say if he did anything he does not know what he did.

Det Johnson directly asked where Martin was at when he picked up the car. Martin stated he was

released from jail today on an arrest a few days ago. Det Johnson asked if he found the car

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shortly after leaving the jail. He stated, "Sort of". Det Johnson asked where that was at when he

found the car and he said, "At a gas station". Martin ultimately requested an attorney and the

questioning ended.

Indiana BMV records show Chad Martin has not had a vehicle registered to him since 2011.

On April 30, 2024, the autopsy was conducted by Dr. John Cavanaugh, a pathologist, at the

Marion County Coroner's Office. Det. Gary Toms observed the autopsy. At completion, Dr.

Cavanaugh advised Det Toms Mr. Coffman died from multiple blunt force trauma injuries

specifically the liver was torn in half, his neck was broken, as well as broken ribs, pelvis, and

hip. Dr. Cavanaugh did not decide on a manner of death.

Det. Johnson received a latent fingerprint identification report from Det Brian Wills who

conducted the latent examination. The report states a print recovered from the front interior

driver's side window of the 2007 Toyota was matched on comparison to the #09 finger of Chad

Martin DOB:01/09/1991.

All events occurred in Marion County, Indiana.

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/s/ Anthony D. Johnson

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