

**STATE OF INDIANA  
MARION COUNTY, ss:**

**IN THE MARION SUPERIOR COURT  
CRIMINAL DIVISION**

**Cause No: 49**

STATE OF INDIANA )  
 )  
 vs. )  
 )

**INFORMATION**  
**COUNT I**  
RECKLESS HOMICIDE  
I.C. 35-42-1-5  
A LEVEL 5 FELONY

**Ladrelle Bryant B/Male  
DOB 4/3/1983**

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 January 18, 2024, Ladrelle Bryant did recklessly kill Alfred Wombles, another human being;

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

May 13, 2024  
Date

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

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

**State's Witnesses:**  
NICHOLAS CAULEY  
MICHAEL COOPER  
SANGEETA JOSHI Ph.D.  
CHELSEA MILLER  
JOSEPH POINDEXTER  
RONALD SAYLES  
BRYAN SOSBE  
SERWAA SYERS  
GARY TOMS  
BLAKELY WATSON  
CHRISTIAN WILLIAMS  
Christopher Poulos M.D.

PS

# AFFIDAVIT FOR PROBABLE CAUSE

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STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Ronald Sayles swears (affirms) that:

On Thursday January 18, 2024, at approximately 6:22 am Indianapolis Metropolitan Police Officers were dispatched to the [REDACTED] North Kenwood Avenue on the report of a person shot. Upon arrival, officers located a white male later identified as Alfred Wombles suffering from apparent gunshot wound(s), lying on the ground just outside of the detached garage on the alley side. Officers also located the 911 caller and alleged shooter later identified as Ladrelle Bryant performing CPR on the unidentified white male. Mr. Bryant advised officers the firearm used in the shooting was on top of a vehicle inside the detached garage, which was visible through the open overhead garage door. Alfred Wombles was transported to Methodist Hospital where he was pronounced deceased. Homicide Detectives were requested and responded to the scene.

Detectives arrived and observed a silver Kia Rio parked four houses down from [REDACTED] North Kenwood Avenue in the alley east of the residence facing northbound. The vehicle's engine was still running, the vehicle was filled with many miscellaneous items, and there was no person with the vehicle. A BMV records check of Indiana plate [REDACTED] revealed the plate was stolen, reported on July 13, 2020, under IMPD case number IP200068828. Detective Toms

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

/S/ Ronald Sayles  
AFFIANT

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**Affidavit for Probable Cause**

**From:** Detective Ronald Sayles

observed the VIN for the Kia Rio. A BMV records check of the VIN revealed the vehicle was stolen, reported on January 6, 2024, under IMPD case number IP240001784.

Ladrelle Bryant was transported to the Homicide Office located at 50 North Alabama Street, Indianapolis, IN 46204, to be interviewed. On January 18, 2024, at 8:03 am, Detective Sayles conducted a video and audio recorded interview of Ladrelle Bryant. The interview took place at 50 North Alabama Street, Indianapolis, IN 46204, inside an interview room. Detective Sayles read Ladrelle his advice of rights and waiver of rights from an advice of rights / waiver of rights form. Ladrelle stated he understood his rights and waiver of rights. Ladrelle signed his name on the advice of rights / waiver of rights form.

During the interview, Ladrelle stated he had returned to his detached garage of residence located at [REDACTED] North Kenwood Avenue, from dropping his child off at their school's bus stop near West 31<sup>st</sup> / North Capital Avenue. It was around 6:20 am and he was seated on the driver seat inside his Kia Carnival which was parked inside the detached garage facing the alley with the overhead garage door open. Ladrelle had been sitting for around two to three minutes with his head down looking at his phone. He observed from his peripheral an unknown white male running into his detached garage toward the driver side of his Kia Carnival.

Ladrelle stated the unknown white males' hands were raised and he appeared to be holding an item. Ladrelle believed the male was holding a gun or knife. At this moment he feared he would be killed inside his vehicle, so he attempted to quickly exit his vehicle. His 9mm Smith & Wesson handgun was lying on his lap. As he was exiting his vehicle the unknown while I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

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male was getting closer to him. Ladrelle believed he yelled, "Get the fuck back!" to the unknown male. He fired one shot from his handgun, striking the male. The male fell to the ground and Ladrelle grabbed a cover to stop the bleeding. Ladrelle called 911 and performed CPR on the unknown male until EMS and Police arrived. Ladrelle stated he really wasn't trying to shoot the dude.

Ladrelle stated he observed a silver vehicle parked in the alley east of [REDACTED] North Kenwood Avenue about three houses down from his detached garage. Ladrelle stated the vehicle was running. Ladrelle stated as he was helping the unknown male and unknown female ran over to the male yelling you shot him. Ladrelle stated the unknown female then ran to the silver Kia Rio parked four houses down from [REDACTED] North Kenwood Avenue in the alley east of the residence facing northbound. The unknown female was no longer on scene upon IMPD officers' arrival.

Ladrelle stated his garage had been burglarized twice around a month prior to the shooting. Detective Sayles located an IMPD police report dated December 12, 2023, under IMPD case number IP230121757 in which Ladrelle reported his garage was burglarized on December 12, 2023, between 4am and 6am and second time between 1:30 pm and 3:30pm. Multiple items were taken including the vehicle registration to Ladrelle's van, no suspect information was provided, and surveillance video did not capture the incident.

The Kia Rio was towed to 2600 South Harding Street, Indianapolis, IN, 46221 and secured inside a locked bay.

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**From:** Detective Ronald Sayles

On January 18, 2024, at 12:19 pm, Detective Sayles spoke with CW, sister of Alfred Wombles. CW stated when she heard of the shooting she traveled to the hospital where she was meet by PS who told her she was with Alfred Wombles when he was shot.

On January 18, 2024, Detective Sayles was granted a search warrant for the Kia Rio. Detective Ronald Sayles with assistance from Crime Scene Specialist Blake Watson served the valid and signed search warrant for the Kia Rio at 2600 South Harding Street, Indianapolis, IN, 46221. The following items were collected: photos, latent prints, Samsung mobile device, black bag containing an Indiana ID belonging to white female PS with a date of birth of [REDACTED], Indiana Operator License belonging to white female PS with a date of birth of [REDACTED], Indiana license plate [REDACTED], and a small jar containing suspect marijuana.

On January 24, 2024, Detective Sayles located video of the shooting involving Alfred Wombles and Ladrelle Bryant. The surveillance cameras were located at [REDACTED] North Illinois Street, Indianapolis, IN, 46208. Detective Sayles spoke with the owner of the business who allowed Detective Sayles to review the video and advised he would be available for the Forensic Video Unit to retrieve the video. Detective Sayles sent a surveillance video download request to Sergeant John Burrello of the IMPD Forensic Video Unit to retrieve the surveillance video located at [REDACTED] North Illinois Street.

Detective Sayles reviewed the video and observed the following, the surveillance video time was running one hour and thirty-two minutes ahead of the actual time. On January 18, 2024, at 6:03 am Ladrelle Bryant leaves his detached garage located at [REDACTED] N Kenwood Avenue, I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

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traveling inside his Kia Carnival van southbound in the alley. Ladrelle closes the overhead door to garage by using the touch pad attached to the exterior framing. The exterior light attached to the garage was turned on. At 6:13 am Ladrelle returns to his garage, traveling northbound in the alley. Ladrelle sits in his vehicle for a couple minutes before opening the overhead door by using the touch pad. At 6:16 am Ladrelle backs his Kia Carnival van into his garage. At 6:18 am the Kia Rio travels slowly, southbound, through the alley passing [REDACTED] N Kenwood Avenue, whose overhead door was still open and Ladrelle still seated inside his Kia Carnival. At 6:19 am Alfred Wombles and a second individual can be seen walking northbound in the alley approaching the garage. Alfred approaches the open garage while the second individual stays back further south in the alley. Alfred appears to be walking in the alley toward the front passenger side of the Kia Carnival but then begins moving across the front of the Kia Carnival toward the front driver side. Alfred appears to be near the threshold of the garage but does not appear to step inside. As Alfred stops at the threshold, facing the front driver side of the Kia Carnival van, he is shot and falls to the ground. Detective Sayles observed Ladrelle and the individual with Alfred approach Alfred as he lies on the ground. The individual who was with Alfred leaves the area shortly after, southbound through the alley. Ladrelle calls police/EMS and waits for their arrival.

On January 23, 2024, Detective Sayles learned from CW that PS was homeless and did not have a contact phone number. Detective Sayles asked CW if PS contacted her to have PS contact Detective Sayles because he needed to interview her.

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

/S/ Ronald Sayles  
AFFIANT

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**From:** Detective Ronald Sayles

On January 29, 2024, at 12:32 am, Detective Sayles conducted a video and audio recorded interview of PS. The interview took place at 50 North Alabama Street, Indianapolis, IN 46204, inside an interview room. Detective Sayles read PS her advice of rights and waiver of rights from an advice of rights / waiver of rights form. PS stated she understood her rights and waiver of rights. PS signed her name on the advice of rights / waiver of rights form.

During the interview, PS stated she and Alfred are homeless, stay in vacant properties, are methamphetamine users and pilfer through trash cans throughout the city. On the night of January 18, 2024, she, Alfred, and a male known to her as C were traveling inside a small silver/gray vehicle. C was driving, Alfred was seated on the front passenger seat, and PS was seated between the front passenger seat and front passenger floorboard.

As they were traveling in the [REDACTED] block of Kenwood Avenue, Alfred saw some trash cans that were full. The trash cans were near the open garage of [REDACTED] North Kenwood Avenue. Alfred asked her to come with him to check the trash cans. She and Alfred exited the vehicle leaving C behind and began walking toward the trash cans. She was at least three feet behind Alfred. As Alfred approached the open overhead door to the garage of [REDACTED] North Kenwood Avenue, he stopped at the threshold. PS heard gun shots. She then heard Alfred say you shot me, and Alfred dropped onto the ground.

PS stated she asked the shooter to call for help. She stayed with Alfred until he stopped breathing. PS had failure to appear warrants and left the scene, getting onto a bus and traveling to a friend's residence. She then located Alfred's sister K's Facebook page and call her over I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

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Facebook to let the family know what happened. She did not see C after the shots were fired and did not know where he went. PS stated she and Alfred were not trying to rob the man. The man inside the garage was sitting inside his vehicle and the vehicle was not running. Alfred never went inside the man's garage and didn't have a screwdriver. PS stated the shooter never said anything to Alfred before firing.

While reviewing body worn camera video from IMPD officer Nicholas Cauley, Detective Sayles observed Officer Cauley was the first IMPD officer to arrive and immediately began assisting medics. Detective Sayles observed medics advise Officer Cauley a screwdriver was inside Alfred's pocket and that he was going to remove it. The medic removed the screwdriver from the left front pocket of Alfred Wombles and placed it onto the ground. Alfred was then placed onto a cart and moved into an ambulance.

While reviewing body worn camera video from IMPD officer Joseph Poindexter, Detective Sayles observed Officer Poindexter arrive second and approach Ladrelle Bryant while Officer Cauley was assisting medics. Officer Poindexter asked Ladrelle is this your property, Ladrelle responded, "Yes sir." Officer Poindexter asked Ladrelle where's your pistol and Ladrelle responded, "Its over there." Officer Poindexter stated to Ladrelle, "Let me make sure you don't have anything else on you real quick" and began to pat Ladrelle down. Once finished Officer Poindexter asked Ladrelle what happened.

Ladrelle stated to Officer Poindexter that he was sitting inside his car after dropping his daughter off. A dude came running up, "I didn't know if he was trying to rob me or break in. I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

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opened the door; I was trying to shoot a warning shot to scare him away. I guess I hit him, I didn't, I wasn't trying to hit, kill that dude. I fired one shot.”

All events occurred in Marion County, Indiana.

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/S/ Ronald Sayles  
AFFIANT

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