

STATE OF INDIANA )  
) SS:  
COUNTY OF MARION )

IN THE MARION COUNTY SUPERIOR  
COURT 31  
CRIMINAL DIVISION

STATE OF INDIANA )  
)  
v. )  
)  
DEONTA WILLIAMS )  
DOB: 11/19/2001  
B/Male  
Gallery: 000000826502

CAUSE NOS. 49D31-2112-F1-036696  
49D31-2211-F4-030792  
49D31-2107-CM-023222

**PLEA AGREEMENT**

The Defendant, in person and by counsel, and the State of Indiana, hereby enter into this plea agreement made pursuant to negotiations. **The State may withdraw from this agreement if Defendant is charged in a new criminal matter, Defendant fails to appear in court, victim and/or law enforcement express disapproval of offer, discovery of new information (e.g., additional criminal history, victim(s)' injuries, restitution).** The parties agree as follows:

1. This agreement, signed by the Defendant, Defense Counsel, and the Deputy Prosecuting Attorney assigned to the above case, shall be introduced into evidence by stipulation of all the parties at the time of the guilty plea.
2. Defendant enters into this agreement knowing that the Court has the authority to accept or reject the agreement and understands that the Court may take the Defendant's criminal record into consideration in determining whether to accept or reject this plea agreement.
3. The Defendant agrees to plead guilty to:

**Under 49D31-2112-F1-036696: Count 1: Attempted Murder a Level 1 Felony; Count 2: Attempted Murder a Level 1 Felony**

**Under 49D31-2211-F4-030792: Count 1: Prisoner Possessing a Deadly Weapon a Level 4 Felony**

4. At the time of sentencing, the State will dismiss: **All Counts under 49D31-2107-CM-023222 and all remaining counts under 49D31-2211-F4-030792.**
5. At the time of the taking of the guilty plea and again at the time of the Defendant's sentencing, the State reserves the right to question witnesses and comment on any evidence presented upon which the Court may rely to determine the sentence to be imposed; to present testimony or statements from the victim(s) or victim representative(s), and the State of Indiana and the Defendant agrees that the Court shall impose the following sentence:
  - a. **Under 49D31-2112-F1-036696, Count 1, initial executed time capped at thirty (30) years.**
  - b. **Under 49D31-2112-F1-036696, Count 2, initial executed time capped at thirty (30) years.**
  - c. **Under 49D31-2211-F4-030792, Count 1, initial executed time capped at six (6) years.**
  - d. **Sentences in each Cause shall run consecutively as mandated by law. Sentences under 49D31-2112-F1-036696 Counts 1 and 2 open to the Court as to whether consecutive or concurrent.**
  - e. **The Defendant agrees to have no contact with Ryne Lane, Stephen Elliott, and Kevin McClanahan for the duration of their sentence.**
  - f. **The Defendant agrees to have any weapons seized under IP210124124 destroyed. The State of Indiana will file an Order to that effect.**
  - g. **All other aspects of the Defendant's sentence shall be determined by the Court, after argument of the parties.**

6. Defendant hereby waives the right to appeal any sentence imposed by the Court, including the right to seek appellate review of the sentence pursuant to Indiana Appellate Rule 7(B), so long as the Court sentences the

defendant within the terms of this plea agreement (AW).

7. The Defendant acknowledges that the State's recommendation, or agreement to make no recommendation, is based on the Defendant's criminal history known to the Deputy Prosecutor representing the State at the time this agreement is executed and who entered into the agreement. In the event that such information is incomplete, that a further or more accurate criminal history is discovered prior to the entry of judgment or the Defendant is charged with the commission of another offense prior to sentencing, the State reserves the right to unilaterally withdraw from this agreement at any time prior to the entry of judgment herein. (AW).

8. The Defendant understands and acknowledges by his initials that if this agreement is accepted by the Court, the Defendant will give up the following rights:

- AW (a) the right to a public and speedy trial by jury;
- AW (b) the right to confront and cross examine the witnesses against him;
- AW (c) the right to have compulsory process for obtaining witnesses in his favor;
- AW (d) the right to require the State to prove his guilt beyond a reasonable doubt;
- AW (e) the right to remain silent and the right not to be compelled to testify against oneself;
- AW (f) the right to present evidence on one's own behalf and to be presumed innocent until proven guilty beyond a reasonable doubt;
- AW (g) the right to appeal the conviction(s).

9. The Defendant further acknowledges that entry of a guilty plea pursuant to this agreement constitutes an admission of the truth of all facts alleged in the charge or counts to which the Defendant pleads guilty and that entry of the guilty plea will result in a conviction on those charges or counts. (AW).

10. The Defendant acknowledges satisfaction with Defense Counsel's representation and competency in this matter (AW). The Defendant believes this agreement to be in the Defendant's best interest. (AW).

11. The Defendant acknowledges that he has a right to pursue post-conviction relief, if there is a legal and factual basis to do so, and that entering a guilty plea herein does not operate as a waiver of that right. (AW).

12. If the Defendant is not a United States citizen, this criminal conviction could affect the Defendant's immigration status including, but not limited to, the Defendant being deported from the United States, the Defendant being denied re-entry into the United States, and the Defendant being prohibited from becoming a citizen of the United States. (AW).

13. This agreement embodies the entire agreement between the parties and no promises or inducements have been made or given to the Defendant by the State which is not part of this written agreement. (AW).

14. Pursuant to Access to Court Records Rule 8(A) and Indiana Code 35-35-3-3, the Defendant and the State waive the right to exclude the pending plea agreement from Public Access. (AW).

Deonta Williams

DEONTA WILLIAMS  
Defendant

Joshua Puryear

Joshua Puryear, #30814-49  
Defendant's Counsel

/s/ Steven Kibbe

Steven E. Kibbe  
Steven E. Kibbe, #35271-53  
Deputy Prosecuting Attorney

**CERTIFICATION OF VICTIM NOTIFICATION**

I, Steven E. Kibbe, Deputy Prosecuting Attorney, certify that I have complied with the requirements in Indiana Code 35-35-3.

/s/ Steven Kibbe

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Steven E. Kibbe, #35271-53  
Deputy Prosecuting Attorney