

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Agency case report: IP240091317

Detective Lieutenant Craig Stewart has knowledge that:

On September 24, 2024, IMPD responded to 300 East Fall Creek Parkway North Drive at the Julia Carson Government Building on a report of a disturbance, which was subsequently reported under Indianapolis Metropolitan Police Department (IMPD) case number IP240091317 and CAD IP24092400002018.

According to the text of the IMPD CAD, preserved by the Metropolitan Emergency Services Agency, officers were advised "...the constable is harassing the trustee..." followed by the notification, "Julia Carson Center...'Disruption w/Elected Officials' in parking lot."

In his report, IMPD Officer Matthew Miles (A245/44207) stated that Center Township Denise Hatch had entered and interrupted a meeting hosted by Trustee LaDonna Freeman without having been invited. Despite being asked multiple times to stop her disorderly behavior, Constable Hatch refused and continued her tirade in front of an audience. It was not until a Special Deputy working security inside the building arrived and escorted Constable Hatch from the premise that the disturbance ended.

On Wednesday, September 25, 2024, this criminal complaint was routed to the IMPD Special Investigations Section for review and assigned to Detective Lieutenant Craig Stewart to investigate.

On Thursday, September 26, 2024, Detective Lieutenant Craig Stewart interviewed the Elected Trustee, LaDonna Freeman, about this incident in her 300 East Fall Creek Parkway North Drive office.

In her statement, Trustee Freeman stated she was attending the monthly meeting of the Center Township Democrat Club in Conference Rooms A and C at the Julia Carson Government Center located at 300 East Fall Creek Parkway, North Drive, Indianapolis, IN on Tuesday, September 24, 2024. Trustee Freeman reported that this meeting was attended by several township officials and members of the public, including three minor children.

Trustee Freeman stated this meeting was open to the public and that invitees were notified by email of the meeting's schedule and location and any member of the public could attend, regardless of their political affiliation.

Trustee Freeman stated during the scheduled time of this meeting (approximately 6 p.m.), Constable Hatch had secured an adjacent space in Conference Room B to swear in deputy constables. Trustee Freeman stated Constable Hatch first appeared in adjoining conference

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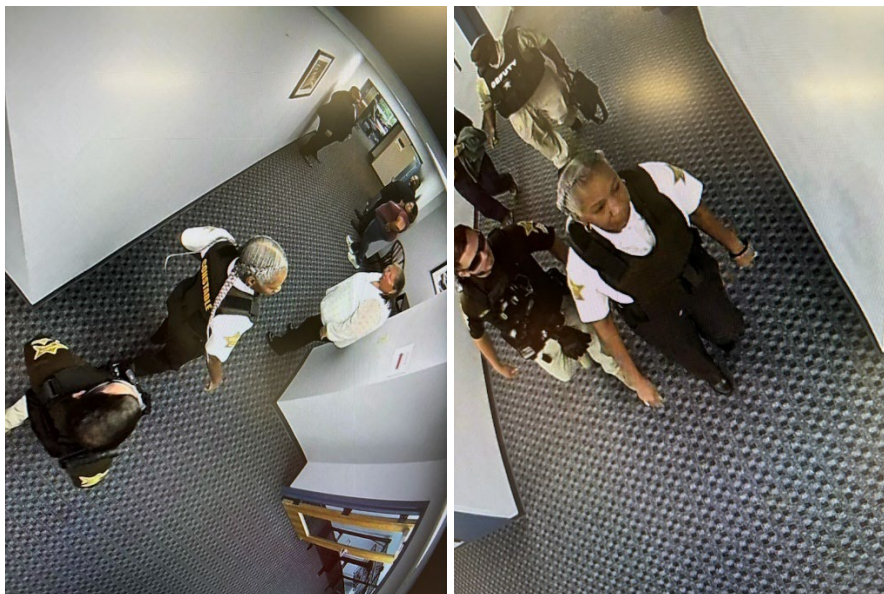
rooms A and C shortly before their respective meetings began. Trustee Freeman indicated Constable Hatch appeared in uniform and confronted her and said "...quit writing checks, and the Democratic Party don't do that, they not done them right," in reference to her on-going disagreement with the Order Appointing Special Constables For Center Township, Marion County, Indiana filed October 17, 2023 and the Order Appointment To Effectuate Service Of Process By Certified Mail For Center Township Small Claims Court Of Marion County, Indiana filed May 25, 2023.

At that time, Trustee Freeman explained to Constable Denise Hatch, "Denise you have your own meeting...in [conference room] B, this is not the time for it," and afterward, both meetings started separately in their respective room assignments.

Trustee Freeman reported that at approximately 6:45 p.m., while her meeting was still in progress, Constable Hatch entered her meeting and caused a disturbance in front of the attendees while demanding, "let me speak, I'm gonna' speak, I gonna' say what I wanna' say" before Trustee Freeman advised she would afford her an opportunity to speak but that a speaker was already addressing the assembly and that, "...you're being disruptive." Trustee Freeman advised Constable Hatch "...just kept going on, and she kept getting louder and louder." Trustee Freeman stated she told Constable Hatch, "I'm gonna' ask you politely, you're being disrespectful in here."

While previously acknowledging that she was not invited to Trustee Freeman's meeting, Constable Hatch Trustee Freeman stated that Constable Hatch was in uniform and dressed in brown pants and a white shirt with constable patches on the shoulder and described what is commonly referred to as an exterior vest carrier over her shirt. Trustee Freeman did not recall seeing a police badge or a firearm at that time. Trustee Freeman stated that during her continued outburst, Constable Hatch complained about being incarcerated for 85 days and went so far as to lift her leg up and place her foot on a chair to show the group her home-detention ankle bracelet.

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Trustee Freeman stated she requested that Constable Hatch leave the meeting three times, instructed her to "get out" approximately three separate times, and eventually used an expletive to order her out of the meeting. Trustee Freeman stated that she requested assistance from Special Deputy Theodore Muhammad to assist in Constable Hatch's removal from the conference room and upon his arrival, Constable Hatch and Deputy Ragland left without having to be physically restrained or moved.

Trustee Freeman stated that even after leaving the conference room, Constable Hatch continued to use profanity and call her a "B-I-T-C-H" approximately 15 times in the hallway outside of the meeting room.

Trustee Freeman outlined a generalized fear and concern that Constable Hatch would start arresting attendees, based on a past incident with Trustee Freeman's staff where two professional staff members were handcuffed and transported from the building before being released without later being charged. Trustee Freeman added, "...Because I feel like they know that they can put handcuffs, they can handcuff me, they can handcuff, they could've handcuffed my cousin, all those people in that meeting, I mean it could've been ugly."

Finally, Trustee Freeman informed Lt. Stewart, "Every time she comes in here, she creates a disturbance, even with my security, and I just tell them, 'don't say nothing to her, don't get her going...you feel like there's nothing you can do about it, because she's the law...it hurts.'"

During the course of this investigation, Lt. Stewart was able to confirm that Constable Hatch moved her office items from this building sometime in November 2023 and changed her

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business address to her residence at 1018 Parker, Indianapolis, IN. According to Judge Roper and Trustee Freeman, Constable Hatch no longer has a business interest in entering the Julia Carson Government Center unless she requests and is granted permission to use the facilities through Trustee Freeman.

On September 26, 2024, Lt. Stewart interviewed Special Deputy Theodore Muhammad about this incident. Deputy Muhammad, who worked as building security during the incident, stated he did respond to the scene in the conference room and was able to escort Constable Hatch and Deputy Constable Ragland out of the building without incident. Deputy Muhammad stated that he saw Deputy Constable Ragland (in full uniform and with a firearm) place his hand on his taser at one point but that he did not pull it from its holster or point it.

All of the above events occurred in Indianapolis, Marion County, Indiana.

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

DATED: September 30, 2024

/s/ Lt. Craig Stewart
AFFIANT