

STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT
CRIMINAL DIVISION

THE STATE OF INDIANA

)

INFORMATION

)

COUNT I

vs.

)

THEFT, CLASS D FELONY I.C. 35-

)

43-4-2

Angela Evans W/F

DOB 10/2/72

CAUSE NO. 49F091001FD004470

(AS TO COUNT(S) I)

On this date, D. Lindsey came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

Angela Evans, on or about June - December 2009, did knowingly exert unauthorized control over the property, that is: U.S. Currency, of PTO of Wayne Township School Corporation, with intent to deprive PTO of Wayne Township School Corporation of any part of the value or use of said property;

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

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

Affiant

01/20/2010
Date

CARL J. BRIZZI
Marion County Prosecutor
19th Judicial Circuit

State's Witnesses:
D. Lindsey L5377 IMPD
D. Scheffel S1869 WTSPD
Mora Clark
Richard Hollingsworth
Dennis Tackitt
Kim Horton

Deputy Prosecuting Attorney

**AFFIDAVIT
FOR PROBABLE CAUSE**

STATE OF INDIANA, COUNTY OF MARION, SS: DETECTIVE DAVID A. LINDSEY SWEARS (AFFIRMS) THAT: On January 8, 2010, Richard Hollinghead, Assistant Principal, of Maplewood Elementary school, 1643 S Dunlap Ave., reported the theft of money from the school's Parent Teacher Organization (PTO) fund. Richard Hollinghead reported the theft to Doug Scheffel, Director of Safety and Security, with the Wayne Township School Police.

On January 12, 2010, Detective Lindsey met with Mora Clark, Principal, at Maplewood Elementary school. Mora Clark gave Detective Lindsey the Chase bank statements for the Maplewood PTO account. The Chase bank statements showed the activity of the PTO account from June 20, 2009 to December 21, 2009. Mora Clark stated the school suspected the current PTO president, Angela Evans, of making several unauthorized purchases and ATM withdraws from the Chase PTO account. The statements showed several purchases and ATM withdraws made with the business Visa debit card assigned to Angela Evans. Mora Clark gave Detective Lindsey the Maplewood PTO business debit card used by Angela Evans to make the purchases. Detective Lindsey observed the business debit card had a green background. Mora Clark had highlighted the authorized purchases on the statements. Mora Clark stated the remaining charges were all unauthorized. Mora Clark stated Angela Evan's mother was the treasurer of the Maplewood PTO. Detective Lindsey observed the following information from the Maplewood PTO bank statements:

1) June 20, 2009 to July 21, 2009	One unauthorized charge	\$ 6.41
2) July 21, 09 to August 21, 09	Nine unauthorized charges	\$ 691.40
3) August 22, 09 to Sept. 22, 09	Five unauthorized charges	\$ 328.77
4) Sept 23, 09 to Oct 22, 09	Thirteen unauthorized charges	\$ 367.15
5) Oct 23, 09 to Nov 23, 09	Twenty three unauthorized charges	\$ 1213.32
6) Nov 24, 09 to Dec 21, 09	Twenty two unauthorized charges	\$ 1166.66
7) Dec 22, 09 to Jan 4, 10	Six unauthorized charges	\$ 533.95

Detective Lindsey observed the total of the unauthorized purchases was four thousand three hundred seven dollars and sixty six cents. Detective Lindsey observed twenty five transactions were completed outside of Marion County and the remaining fifty four transactions were in completed in Marion County.

On January 8, 2010, Mora Clark, Richard Hollinghead and Dennis Tackitt, Chief Financial Officer with Wayne Township Schools, met with Angela Evans. According to Mora Clark, Angela Evans admitted to making the charges. Angela Evans stated she had used the wrong debit card when making purchases. Angela Evans stated she had a personal Chase checking account and she used the Maplewood PTO business debit card instead of her Chase personal checking debit card. Angela Evans stated no one else on the PTO board knew about the unauthorized charges.

On January 13, 2010, Detective Lindsey typed a Grand Jury Subpoena requesting the bank statements from Angela Evan's Chase personal checking account.

On January 15, 2010, Detective Lindsey hand carried the signed Grand Jury Subpoena to Kim Horton, Fraud Investigator, with Chase Bank. Kim Horton provided Detective Lindsey with copies of Angela Evans Chase Checking account statements from June 20, 2009 to January 8, 2010. After reviewing the bank statements, Detective Lindsey observed the Chase Checking account, XXXXX7675, showed Angela Evans as the sole owner of the account. Detective Lindsey observed the statements showed several personal debit card transactions made on the account from July 2009 to January 2010.

On January 15, 2010, Angela Evans met with Detective Lindsey at the Financial Crimes Unit office. Angela Evans signed a rights waiver and agreed to speak to Detective Lindsey regarding the Maplewood PTO account. Angela Evans refused to give a taped statement. Angela Evans stated she became President of the Maplewood PTO in June of 2009. Angela Evans stated the year before she was Vice President of the PTO. Angela Evans stated her mother, Paula Kriech, was the treasurer of the Maplewood PTO and knew nothing about the charges she had made on the account. Angela Evans stated she and the board's president and treasurer were the only PTO board members with a business debit card. Angela Evans stated the monthly bank statements for the Maplewood PTO account were forwarded to her by the school. Angela Evans stated she never opened the bank statements. Angela Evans stated she didn't even open her own Chase personal checking account bank statements. Angela Evans stated after receiving the PTO debit card she changed the personal identification number (PIN) on the card to match the PIN on her personal Chase debit card. Angela Evans stated she did this so she would not forget the PIN. Detective Lindsey showed Angela Evans the green Chase Business Debit card, card # XXXXXXXXXXXXX8697, he was given by Principal Mora Clark. Angela Evans stated the business debit card shown to her by Detective Lindsey was the same business debit card she had used to make the unauthorized purchases and ATM withdraws. Angela Evans stated her personal Chase bank debit card has a blue background. Angela Evans admitted to making all of the unauthorized charges listed on the Maplewood PTO Chase bank statements shown to her by Detective Lindsey. Angela Evans stated one of the first times she used the business debit card was at Aerospatiale in August 2009. Angela Evans it was an honest mistake when she used the business debit card at Aerospatiale. Angela Evans stated she had mistakenly used the business debit card not realizing until later that she had used the Maplewood PTO business debit card. Angela Evans did admit even though she knew she had used the business debit card she did not repay the money back to the Maplewood PTO account. Angela Evans stated she knew the remaining charges were not authorized. Angela Evans admitted she knew what she was doing was wrong. Angela Evans stated she was sorry for what she had done and was willing to pay back all of the money owed to the Maplewood PTO.

ALL THESE EVENTS OCCURRED IN MARION COUNTY, HENDRICKS COUNTY AND BARTHLOMEW COUNTY, INDIANA.

I SWEAR (AFFIRM), UNDER PENALTY OF PERJURY AS SPECIFIED BY IC 35-44-2-1, THAT THE FORGOING REPRESENTATIONS ARE TRUE.

1/20/10
DATE

DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

AFFIANT

JUDGE