

STATE OF INDIANA  
MARION COUNTY, ss:

IN THE MARION SUPERIOR  
CRIMINAL COURT 18  
CRIMINAL DIVISION, ROOM W342

STATE OF INDIANA )  
)  
vs. )  
)

Cause No: 49G18-1412-F6-055464

Christopher Dickerson W/Male  
DOB 4/17/1983

INFORMATION  
COUNT I  
OBSTRUCTION OF JUSTICE  
I.C. 35-44.1-2-2(a)(3)  
A LEVEL 6 FELONY  
COUNT II  
OFFICIAL MISCONDUCT  
I.C. 35-44.1-1-1(1)  
A LEVEL 6 FELONY  
COUNT III  
THEFT  
I.C. 35-43-4-2(a)  
A LEVEL 6 FELONY

**FILED**

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DEC 18 2014

*Elizabeth A. White*  
CLERK OF THE MARION CIRCUIT COURT

On this date, the undersigned 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

On or about November 8, 2014, Christopher Dickerson did knowingly remove any thing, that is: three (3) handguns and/or magazines and/or ammunition, with the intent to prevent said property from being produced and/or used as evidence in any official investigation or proceeding, that is: Christopher Dickerson took custody of said handguns and/or magazines in his employment capacity as an evidence technician with the Indianapolis Metropolitan Police Department and he did not preserve and/or keep and/or produce said property so it could be produced as evidence in any official proceeding or investigation resulting therein;

COUNT II

On or about November 8, 2014, Christopher Dickerson, a public servant, to-wit: a police officer with the Indianapolis Metropolitan Police Department, did knowingly commit an offense to-wit: Theft, in the performance of his official duties;

COUNT III

On or about November 8, 2014, Christopher Dickerson did knowingly exert unauthorized control over the property of The Indianapolis Metropolitan Police Department, to-wit: three (3) handguns and/or magazines and/or ammunition, with the intent to deprive The Indianapolis Metropolitan Police Department of any part of the use or value of the property, said property have a value of at least seven hundred fifty dollars and less than the value of fifty thousand dollars;

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 I.C. 35-44-2-1 that the foregoing representations are true.

*Lettie Patrick*  
Affiant

December 18, 2014  
Date

State's Witnesses:  
The Indianapolis Metropolitan Police Department  
L. Patrick IMPD 20919  
J. Green IMPD G5712  
K. Flynn IMPD 31686  
W. Amberger IMPD 30419  
J. Hidlebaugh IMPD 31699  
C. Lucas IMPD 31719  
Terry Jewell

**TERRY R. CURRY**  
Marion County Prosecutor  
19th Judicial Circuit

*[Signature]*  
Deputy Prosecuting Attorney

**FILED**  
DEC 18 2014  
*Elizabeth J. White*  
CLERK OF THE MARION CIRCUIT COURT

**FILED**

**SEARCH WARRANT AFFIDAVIT  
(PERSONAL KNOWLEDGE)**

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*Elizabeth A. White*  
CLERK OF THE MARION CIRCUIT COURT

In support of your affiant's assertion of probable cause the following facts are within your affiant's personal knowledge or have been learned through his or her investigation, to wit:

On November 8<sup>th</sup>, 2014 North District middle shift officers responded to the 3500 block of N. Ralston Avenue on a "Shots Fired" run. The caller stated a group of people ran to the house with the handicap walkway on the right side of the street. Officers were able to locate the house as 3520 Ralston Avenue. One of the officers looked in the window and saw a black male look out at him. The subject and four other males then ran out the back door of the residence. The two officers on scene called for more officers to respond. Three of the five males were caught and arrested. Of those three, two of them had existing warrants and one had suspected crack cocaine in his pocket.

Officers Christopher Dickerson, Christopher Lucas, and Kyle Flynn all entered the house. Officers Flynn and Lucas stated they entered the house to do a protective sweep because 3520 Ralston Avenue is a vacant house with an unsecure back door. Officers stated they wanted to make sure there was no one hurt in the residence and to locate any weapons a kid could come across. While inside the residence, both Officers Lucas and Flynn stated they located a scale with white powder residue all over a table and a gun magazine fully loaded with live rounds.

The three officers also went outside and search around the property. Officer Dickerson showed Officers Flynn and Lucas he found three (3) handguns and live ammunition wrap inside a black T-shirt. Officer Dickerson indicated he located the weapons outside the residence in the trash container. All three officers then went to the front of the residence. Officer Dickerson put the guns and ammunition on the trunk of a fully marked police vehicle and then placed them inside a plastic evidence bag. Officer Lucas took a photo of the evidence with his cell phone. Dickerson told Lucas and Flynn he would "take care of it" (the guns and ammunition). Officers Lucas and Flynn stated they believed Officer Dickerson was going to take the guns to the IMPD property room and turn them in as found property and do a supplement to the original report since he is also an Evidence Technician. All three officers then left the scene.

Officer Lucas sent the photo of the guns and ammunition located at 3520 N. Ralston Avenue to Officer Jared Hidlebaugh's cell phone. Hidlebaugh was one of the initial officers on scene earlier. Hidlebaugh sent the photo to Officer Amberger's cell phone, which was also on scene earlier. Officer Amberger and Officer Hidlebaugh had a phone conversation reference the findings from the photo.

A few days later, it was brought to the attention of the officers that Officer Dickerson did not take the guns and ammunition to the IMPD property room. Officer Amberger stated he asked Officer Dickerson after roll call on November 16 what he did with the three handguns and ammunition he recovered from 3520 Ralston Avenue. Officer Amberger stated Officer Dickerson told him he took care of them by throwing them in a lake. Officer Amberger stated he asked Officer Dickerson if he even checked to see if the guns were stolen or part of some other crime. Officer Amberger stated Officer Dickerson told him, he had the guns checked by a friend who works in Hamilton County and they have not been reported as stolen. Officer Amberger stated he was very upset by this information and told his former supervisor, Sandy Storkman. Lieutenant Storkman then relayed the information to Lieutenant George Crooks and me.

Officers Amberger, Hidlebaugh, Lucas, and Flynn all came to the Special Investigation Unit (SIU) office and gave a statement. Officers Lucas and Flynn both stated they saw Officer Dickerson take the three handguns and ammunition and put them in plastic bags. Officers Lucas and Flynn stated Officer Dickerson stated to them he was going to take care of the property. Both Officers stated they assumed Officer Dickerson was going to take the property to the IMPD Property Room. At that time, Officer Christopher Dickerson was requested to the SIU office to give a statement about the whereabouts of the three handguns and ammunition. Officer Dickerson stated he wanted an attorney and did not want to give a statement.

During the course of my investigation, I learned no handguns or ammunitions were turned into the IMPD Property Room by Officer Christopher Dickerson reference the 3520 Ralston Avenue incident. Officer Lucas was shown a copy of a photograph that contained three handguns and five magazines lying on a clear plastic bag on the trunk of a gray marked police vehicle. Officer Lucas verified the photograph as being what he took with his cell phone when the items were located by Officer Dickerson. IMPD issues Glock 22 to all sworn IMPD Officers. I personally carry the Glock 27, also known as the baby Glock. Based on my training and experience I am able to identify two guns in the photo as being a regular Glock 22 and a baby Glock 27. From my experience as a veteran police officer, I have encountered Ruger LCP in past investigations. Therefore the third gun in the photo I am identifying it as a possible Ruger LCP semi-automatic 9mm. All three guns are black in color. Also recovered were five handgun magazines; four black and one gold colored magazine.

Due to the fact that three (3) handguns and five (5) magazines were never placed in the IMPD Property Room, there was probable cause to believe Christopher Dickerson still had the handguns and magazines in his possession. On December 3, 2014, a search warrant was served at Dickerson's residence. During the execution of the search warrant, we discovered that Dickerson is a gun collector and has been one for many years. The detectives observed over forty (40) firearms inside Dickerson's residence.

Since the above handguns and ammunition were not turned into the IMPD Property Room and Christopher Dickerson told his girlfriend the handguns were fake and he disassembled them and

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*Charlotta White*  
CLERK OF THE MARION CIRCUIT COURT

threw them in dumpsters. Officer Dickerson told Officers Flynn and Amberger that he threw the three handguns into a lake there is probable cause to believe Officer Christopher Dickerson has obtained other weapons illegally.

I am requesting a search warrant to seize any and all dischargeable weapons and ammunitions which includes long guns, handguns, and cannons that may be found at his residence located at [REDACTED] Indianapolis, Marion County, Indiana 46235, which is a one story peach color house with a peach barn trimmed in white on the right side of the property and peach color brick front on the left side of the house, all property contained within the garage, curtilage, and fenced in yard, as well as vehicles he has personal access to, which includes a black 1984 Honda motorcycle bearing plate number M118PK, a black MAG trailer bearing plate number TR670HWA, a white FRI trailer bearing plate number R445CY, including all contents contained within/on the trailer, Christopher Dickerson's person, and a 2006 black Kia bearing plate number 262KAD for the property described above.

These items may contain long guns, handguns, cannons and/or ammunitions that were obtained illegally by Christopher Dickerson not taking the items to the IMPD Property Room and could contain incrimination evidence as it pertains to this investigation.

Therefore your affiant respectfully requests the court to issue a search warrant directing a comprehensive search for and seizure of the above described property.

**FILED**

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*Bettie Patra*  
AFFIANT  
*Elizabeth A. White*  
CLERK OF THE MARION CIRCUIT COURT

SUBSCRIBED AND SWORN BEFORE ME THIS 18 DAY OF December, 2014

*[Signature]*  
\_\_\_\_\_  
JUDGE  
SUPERIOR COURT NO 18

A copy of the P.C. and or Warrant (s) were filed with Court \_\_\_\_\_'s Judicial Officer on this \_\_\_\_\_ day of \_\_\_\_\_, 201\_, at \_\_\_\_\_ o'clock (AM/PM).