

**AFFIDAVIT
FOR PROBABLE CAUSE**

STATE OF INDIANA, COUNTY OF MARION, SS:

Detective Ronald Clayton swears (affirms) that: IP260017346

On March 7th, 2026, at approximately 1:53 am, IMPD Officers were dispatched to a disturbance with a person shot at the intersection of Washington and Pennsylvania Street.

Officer Bowersox and Officer Perry were the first to arrive and observed Lamonte Thomas on top of C.B. with Jamar Thomas lying on the ground next to them with a gunshot wound to the abdomen.

I arrived on scene with Det. Morgan and spoke with Officer Albert, who stated that the incident was captured on one of the city's cameras.

While at the scene, Officer Keith Albert had pulled up footage from public safety cameras, which captured the incident on video.

Upon watching the video, detectives observed a group of individuals, including C.B., who was identified by his yellow shirt. The group was waiting to cross the street at the intersection of Washington and Pennsylvania Street. Detectives observed Lamont Thomas and Jamar Thomas walk to the intersection and approach C.B., who had his back towards them. Immediately, Lamont Thomas and Jamar Thomas surround C.B. and begin grabbing at his waist. Lamont Thomas and Jamar Thomas take C.B. to the ground, appearing to be on top of him. Shortly after the altercation began, Jamar Thomas fell off C.B. and rolled to his side. Lamont Thomas remained on top of C.B. until police arrived.

Jamar Thomas and C.B. were transported to the Homicide Office to be interviewed.

Det. Rigby responded to Eskenazi Hospital for a medical update on Jamar Thomas, Det. Rigby advised that Jamar Thomas' condition has declined to critical and is being moved to surgery.

I, Det. Clayton did a crime scene walk through with Det. Morgan and Officer Albert, observing a hat, broken glasses, a silver ring, a shirt, pants, two live rounds, and a handgun, all group together on the corner of the sidewalk. In the far-left lane of Pennsylvania Street was a gun magazine with live rounds.

I told C.B. that he was going to be transported to the office for a formal statement when I noticed an empty gun holster in the front part of his waistband with no retention strap. This was documented by Detective Ortega's BWC and removed by Detective Ortega before he transported C.B. to the office.

While on scene, I took an audio recorded statement from C.L. I had asked if she was related to any of the individuals, and she replied no, then stated the following:

"We were eating our tacos over there at the Five Guys, when we observed a white guy there, and his group of friends who were just standing there talking, and then those black guys, like, ran up on him, literally, like, ran up on him. I don't know if they had a previous altercation. They said something, like, stop running, they ran up on him and started beating him up. You see those guys? (They're big, so they took him down really easily. And then the guys started beating him up for a little bit, the white male pulls out his gun. I didn't see if he shot them, but I heard it, and I saw the gun in his hand. And then that's when my friends and I ran, but then I ran over there, and I called 911, and I saw they were still on him. They were still, like, beating him up."

I asked whether they said anything. Did you hear anything? C.L. replied: "It was just, like, yelling, like, something, like, it didn't sound like anything significant. Something about running your mouth." I asked if the white male was losing the fight. C.L. stated "Yes." I then asked her; how many people were on top of him? C.L. replied, the two black males, the one that got shot, and then the other black guy with, like, the hair (Dreads).

While on scene, I took an audio recording statement from T.B.. T.B. stated he had walked around the corner talking when, just all of a sudden, I heard, like, a confrontation. He stated he saw the guy who he had just met and (pointed at C.B.) while at Bakersfield. I don't know, like, what the confrontation was, but I heard something, like, pushing, and I look back, there was some pushing, and all of a sudden, C.B. was on the ground with two guys on top of him. We just kept walking; we didn't realize it was that big of a deal. Then I heard a gunshot. I asked if he could describe the two guys on top of C.B.? T.B. stated they were both black males; one had dreads. T.B. stated he recorded some of it and can send his videos to me.

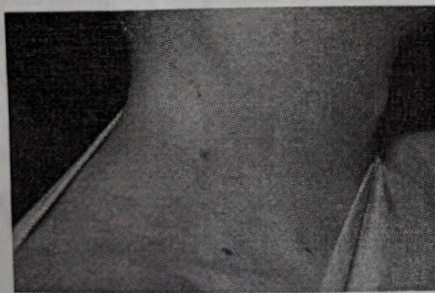
I had. T.B. repeat part of his statement. T.B. stated we came southbound on Pennsylvania, and then I came around this corner and moved down, and then there was like a huge fight. Did you see what started the fight? Mr. Bennet replied, that's what I didn't see, no. But I just remember looking back, and he's on the ground, then I heard a gunshot. We're running, I mean, I'm not dealing with that. I asked T.B. if C.B. was winning the fight or losing the fight. T.B. stated he was on his back with two guys on top of him, and he heard a gunshot. T.B. stated they were all yelling at each other, but not sure what was being said (You fuck with the wrong motherfucker or something). T.B. stated he feels bad for C.B. if he goes to jail because he's just defending himself, you know?

Marion County Crime Lab specialist C. Zimmerman arrived at the scene to recover evidence, take photos, and video of the scene.

On March 7, 2026, at 3:52am I, Det. Clayton and Det. Morgan interviewed C.B., who stated that he and his girlfriend, along with two other individuals they had met, were walking to a bar. C.B. stated that upon passing the alley just north of the intersection, he saw an individual in the alley drinking from a double cup. He explained that it is slang for a cup full of Lean or cough syrup. C.B. said the individual came out of the alley and

began staring at the girls and followed them. C.B. stated that he asked if the unknown male was good, to which the individual said he was wondering if C.B. was good because he was staring back at him. C.B. said there was more back and forth at which time the individual said they could throw hands "fight," which is when C.B. said he wasn't about that, lifting his shirt to show that he was armed.

C.B. stated that he lost track of where the individual went and continued walking with his group and was waiting to cross the street when he was surprised by Lamont Thomas and Jamar Thomas. C.B. stated that both individuals began grabbing at his waist, where he had his gun. He stated that he believed they were with the individual from the alley, and that this individual had told them he had a gun in his waistband. He stated he had never seen either Lamont Thomas or Jamar Thomas before that moment and believed the only way they could have known he had a gun was if the other individual had told them. He stated they took him to the ground while trying to disarm him and take his gun. C.B. stated that Jamar Thomas was on top of him, trying to disarm him when he fired one round, striking him in the abdomen. He stated Jamar Thomas fell off and rolled to the side, and immediately Lamont Thomas began trying to take his gun. C.B. said the magazine fell out, and he was afraid that Lamont Thomas was going to get the gun from him and reload it with the magazine and shoot him. He stated the other individual who had followed them from the alley was behind him, yelling for Lamont Thomas to get his gun. C.B. said he recognized his voice but could not say it was him for certain as he could not see him. C.B. said Lamont Thomas said you shot my uncle; I'm going to kill you. C.B. said Lamont Thomas was choking him and had his hands around his neck. C.B. said he did feel lightheaded and felt as if he was going to be choked out, but remained conscious, at one point fighting Lamont Thomas off enough to yell for help. C.B. stated that Lamont Thomas had managed to take the gun from him at this point. C.B. stated Lamont Thomas remained on top of him, punching him until police arrived and separated the two.



On March 7, 2026, at 4:30am I, Det. Clayton and Det. Morgan took a statement from Lamonte Thomas after I read and he signed the Miranda Waiver Rights form.

Mr. Thomas stated he was inside the Wing Stop ordering his food while his uncle, Jamar Thomas, stepped outside, he paid for the food. Jamar stated that when he went outside Jamar was talking to another individual, talking about someone who pulled a gun out or something like that. Lamonte stated he lit a cigarette and asked Jamar if everything was okay. Jamar stated well I want to make sure everything is okay, so they walked down to the gentleman. Lamonte stated I remember just as I was trying to say (hey), the guy started to say something, as if he started to like wrestling for something, and then we all fell to the ground, and then he reached for something, and then the guy shot my uncle. Lamonte, when asked how you all fell to the ground, stated that when the guy reached into his pocket (for a gun), is when they fell to the ground. Lamonte stated they saw the guy at the corner. He stated he did not know the other male, but they both stated that this guy took a gun out and pointed it at them. Lamonte then stated he walked to the corner to burn time while waiting for his food to smoke his cigarette. When they walked to the guy (not to confront him), and before his uncle said Hey the guy started to fetch around, and that's when they all went to the ground.

Detective Morgan described the video. He told Lamonte it shows him and his uncle walking up to the guy from behind, and it shows Lamonte immediately reaching for the guy's waistband, trying to get the gun, and then taking him to the ground. Lamonte stated that's not how it happened and denied that it had happened, stating the guy started fetching first. Lamonte stated he did not punch him or was not aggressive towards him. Lamonte stated that after the guy shot Jamar, he took his gun away from him, threw it about 10 feet, and held him down until the officers arrived. Lamonte admitted to punching him and possibly choking him just to restrain him. Lamonte stated that he didn't think it was a big deal to go and talk to him, even though the guy had a gun. Detective Morgan asked why you and your uncle walked up from behind, and each of you stood on each side of him, and then you reached for the guy's waistband. Lamonte could not explain why he and his uncle to walk approximately 40 feet and confronted the male by asking him if everything is okay when he had a cell phone to call 911 for police assistance. Lamonte stated that the male pushed the release button to drop the magazine, and he never held the gun. I asked if he applied pressure to the choking, and he said no and chuckled by saying he is still breathing.

Crime Lab Technician Zimmerman arrived at the office and took photos of C.B.'s injuries, which consisted of red marks on his throat, severe scratches, and swelling on his right elbow. C.B. had road rash (scratches) on his shoulder blades from being thrown to the ground on his back. He also had a scrape on his right knee and swelling, along with red marks on his face from being punched by Lamonte. C.B. was complaining of pain in his body. DNA swabs were taken from C.B.'s fingernails for comparison by Crime Lab Technician Zimmerman.

Crime Lab Technician Zimmerman stated from where Lamonte and Jamar Thomas started their walk to approach C.B. was approximately 61 feet.

I released C.B.'s silver ring to him and advised him that the gun holster was being placed in the property room for evidence.

C.B. was then released pending the investigation.

On March 7, 2026, at 7:00am Detective Morgan executed a Buccal Swab search warrant under cause number 49D35-2603-MC-006780 for Lamonte Thomas DNA.

Lamonte Thomas was arrested and transported to the CJC after his interview.

On March 8th, 2026, I reviewed the two cell phone videos sent to me by T.B.. The video shows C.B. on his back while Lamonte and Jamar Thomas are on top of him. Jamar tries to go up to his knees and falls over, holding his stomach with both hands as Lamonte stays on top of him. The video shows Jamar taking the gun magazine and throwing it across the street. I can hear in the audio C.B. saying you walked up on me, to shoot me as C.B. and Lamonte struggle over the gun.



In the second video, I can see Lamonte using force to choke C.B. with both hands and all of his weight leaning forward over C.B.'s face. C.B. is trying to yell for help as Officer Bowersox arrives.



On March 9, 2026, at 4:45pm, I followed up with the medical staff at Eskenazi Hospital. Mr. Jamar Thomas has been upgraded to stable condition after his second surgery. If there are no complications, he will move out of the ICU on March 10th.

On March 9, 2026, at 8:30 pm, I took an audio-recorded statement from A.S.. I asked A.S. if she had already known C.B. before or did you just meet him that night. A.S. stated "no, T.B. and I were just out, and we just ran into them, and we were just chatting. I think they're, are younger, and they were like, can we hang out with you two? We're on our 1st date. A.S. further stated we were just walking around town, like kind of bar

hopping, because I don't think that they're from the area. We started walking from Mass to downtown to check out some bars. What I remember, T.B. and the girlfriend was walking ahead of C.B. and me. I was walking closer to C.B. (The guy who was shot), but he was kind of a little bit behind me. I heard something behind me. I don't know exactly what happened, but C.B. kept telling a skinny black guy from the alley to back the fuck up because he was following us. I was drunk and an idiot, so I got in the middle of them, and was just trying to be silly to calm it down, and I thought that worked because the guy walked away backwards. C.B. and I then walked away, and we're standing at the stoplight waiting to cross over, and I'm talking to C.B., telling him that you don't need to act big and bad if someone, like that, is in your face, just walk away. It's not worth it. As I'm saying that, two different, bigger black guys come from behind us and just grab C.B. around the shoulders. They started hitting him in that moment, as they all fell to the ground." A.S. said she heard a gunshot and ran away. A.S. stated she sense something and turned to see the black males, whom she had never seen before, not even around the skinny black male at the alley. A.S. stated these two males were walking towards us, meaning business. I thought they were going to beat all of us up. I don't know if they knew the guy from the alley or they're in some type of, like, cahoots, gang or whatever, but that's not a coincidence, because C.B., we didn't see these guys before at all. Okay. They came out of nowhere.

I asked if she heard C.B. say anything to them when they came up, and she replied I think it was, like, more like what, like, get off me. kind of. I asked if she had heard the two black males say anything, and she replied - I think they said, what's up, dude? Like, what's up, dude? Like, the cue, like, we're about to beat you up. I asked A.S., do you think they were going to beat him up or were going to rob him? A.S. replied absolutely. When they were walking towards us quickly, I saw in their eyes that they were just staring at him, and then they grabbed him. I asked if she could describe the males. A.S. stated that she believes they were wearing black clothing, and it happened so fast.

I asked A.S. about how long she had been with C.B., and his girlfriend that night, and she replied for about ninety minutes. I asked during this time if she knew if C.B. had a gun on him, and she replied no and that he never talked about it or showed it to them or anyone else during this time. I asked A.S. if she saw C.B. with a gun during the interaction with the skinny black male, who has not been identified to date, and she replied to no.

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

I swear (affirm) under the penalties for perjury that the foregoing facts are true to the best of my knowledge and belief.

/s/ Ronald Clayton

DATED: March 9, 2026 _____