

STATE OF INDIANA)
) SS:
 COUNTY OF ST. JOSEPH)
)
 STATE OF INDIANA)
)
 VS)
)
 SANDER WADE RAY)
 DOB: 10/24/1997)

IN THE ST. JOSEPH SUPERIOR COURT

CAUSE NUMBER. 71

INFORMATION IN FOUR COUNTS:

COUNT I:
 ATTEMPTED BATTERY BY MEANS OF A
 DEADLY WEAPON
 A LEVEL 5 FELONY

COUNT II:
 CRIMINAL RECKLESSNESS
 A LEVEL 6 FELONY

COUNT III:
 RESISTING LAW ENFORCEMENT
 A LEVEL 6 FELONY

COUNT IV:
 RECKLESS DRIVING
 A CLASS C MISDEMEANOR

COUNT I

MICHELLE GOLEBIEWSKI, upon information and belief, affirms under penalty of perjury that:

On or about July 15, 2021 in St. Joseph County, State of Indiana, SANDER WADE RAY with the intent to commit the crime of Battery with a Deadly Weapon, did drive his vehicle directly toward Andrew Hines, which act constituted a substantial step toward the commission of the crime of Battery by Means of a Deadly Weapon.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-42-2-1(c)(1) and I.C. 35-41-5-1 and I.C. 35-42-2-1(g)(2) and I.C. 35-41-5-1, and against the peace and dignity of the State of Indiana.

COUNT II

MICHELLE GOLEBIEWSKI, upon information and belief, affirms under penalty of perjury that:

On or about July 15, 2021 in St. Joseph County, State of Indiana, SANDER WADE RAY did recklessly with a deadly weapon, to wit: a vehicle, perform an act, that created a substantial risk of bodily injury to Andrew Hines.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-42-2-2(a) and I.C. 35-42-2-2(b)(1)(A), and against the peace and dignity of the State of Indiana.

COUNT III

MICHELLE GOLEBIEWSKI, upon information and belief, affirms under penalty of perjury that:

On or about July 15, 2021 in St. Joseph County, State of Indiana, SANDER WADE RAY did knowingly flee from Ronald Kaszas, a law enforcement officer, after said officer identified himself by visible or audible means and visibly or audibly ordered SANDER WADE RAY to stop and in committing said act SANDER WADE RAY used a vehicle.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-44.1-3-1(a)(3) and I.C. 35-44.1-3-1(c)(1)(A), and against the peace and dignity of the State of Indiana.

COUNT IV

MICHELLE GOLEBIEWSKI, upon information and belief, affirms under penalty of perjury that:

On or about July 15, 2021 in St. Joseph County, State of Indiana, SANDER WADE RAY did operate a vehicle and recklessly drove at an unreasonably high rate of speed under the circumstances as to endanger the safety or property of others

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 9-21-8-52(a)(1) , and against the peace and dignity of the State of Indiana.

I affirm under the penalties for perjury that the foregoing representations are true.



MICHELLE GOLEBIEWSKI
DEPUTY PROSECUTING ATTORNEY

Probable cause found. Arrest Warrant Issued.

___ Pursuant to Criminal Rule 26 and the St. Joseph County Release/Detention Matrix, Defendant ordered released on recognizance with a promise to appear. Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

___ Defendant to be held for initial bail hearing on ___ day of _____, 2021 at 1:00 p.m.

XX Defendant to be held for next available bail hearing after the warrant is served.

___ Bond set in the amount of _____ corporate surety or _____ cash.

Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

So found this **16** day of **July**, 2021 at **1:00 PM** am/pm.



JUDGE, ST. JOSEPH SUPERIOR COURT
John M. Marnocha

WITNESSES:

Andrew Hines South Bend Police Department
Ronald Kaszas South Bend Police Department

CASE NUMBER: 71D03-2107-F5-000170 FILED: 7/16/2021

Aaron Brick South Bend Police Department
Joshua Brooks South Bend Police Department
Joseph Galea South Bend Police Department
Nathan Gates South Bend Police Department
Alexander Guitierrez South Bend Police Department
Casey Hof South Bend Police Department
Christopher Krueger South Bend Police Department
Erik Schlegelmilch South Bend Police Department
Jack Stilp South Bend Police Department
Alexander Williams South Bend Police Department
All witnesses listed in police, medical and laboratory reports

STATE OF INDIANA)	IN THE ST. JOSEPH SUPERIOR COURT
)	SS:
ST. JOSEPH COUNTY)	
)	CAUSE NO. 71D__ - ____-F6-_____
STATE OF INDIANA)	
)	
VS.)	SUPPLEMENTAL AFFIDAVIT IN
)	SUPPORT OF PROBABLE CAUSE
SANDER WADE RAY)	
DOB: 10/24/1997)	

DET. ANDREW HINES, affirming under the penalties for perjury, states that:

I am a Detective with the South Bend Police Department Violent Crimes Unit/Shooting Response Team, and am in my twelfth year of service as a Law Enforcement Officer. I make this affidavit based upon my conversations with other Officers, and my own observations in investigating this case.

On July 15th, 2021, Detectives with the South Bend Police Department located SANDER WADE RAY, in the area of the 4400 block of Kankakee Trail, South Bend, St. Joseph County, Indiana. RAY was wanted on warrants at the time. Detectives were able to positively identify RAY. RAY began to leave the area and patrol officers began following RAY, initiating their lights and sirens. Officer Ron Kaszas lead the pursuit in a fully marked South Bend Police Department vehicle. RAY continued to drive away from officers.

Your affiant, being trained in the Precision Immobilization Technique (PIT), which is a pursuit intervention technique intended to disable fleeing vehicles, and being in the general area of the pursuit, took over pursuit in the area of Prairie and Nash Streets. Detective Williams was passenger in my patrol vehicle as we followed RAY. RAY continued to disregard emergency lights and sirens and continued traveling at a high rate of speed. At the intersection of Nash and Dubail, I observed a construction worker leap out of the way of RAY's vehicle.

In the area of Prairie and Grant, I pulled alongside of the RAY's vehicle, in an effort to set myself up for the PIT maneuver. Suspect turned northbound on Grant, and then swerved hard into my patrol vehicle, striking my vehicle in the area of the front passenger wheel and quarter panel, causing significant damage and snapping the tie rod, thus rendering my vehicle disabled and unable to continue pursuit. Officer Williams was able to make eye contact with RAY and observed RAY turn the steering wheel towards my vehicle. RAY was able to evade Law Enforcement in the area of Adams and Lincolnway West.

All of the foregoing took place in St. Joseph County, Indiana.

I affirm, under the penalties for perjury, that the foregoing representations are true.

Det. Andrew Hines

DETECTIVE ANDREW HINES
VIOLENT CRIMES UNIT/SHOOTING RESPONSE TEAM
SOUTH BEND POLICE DEPARTMENT

DETENTION CONSIDERATIONS

The Defendant is currently on probation in Cause Number 71D08-1908-F6-000812, and is therefore disqualified from pretrial release under Criminal Rule 26.

The Defendant is a substantial flight risk or a danger to self, others or the community for the following reasons:

1. The Defendant is currently wanted on warrant for Armed Robbery, a Level 3 Felony, under Cause Number 71D01-2106-F3-000025.
2. The Defendant has a prior conviction for Carrying a Handgun Without a License in Cause Number 46D04-1606-F6-000518
3. The Defendant's criminal history shows numerous convictions for Auto Theft.
4. The Defendant's conduct posed as substantial risk of serious bodily harm and death not only to law enforcement, but for members of the community.

WHEREFORE, the State requests that the Court detain the Defendant until the Court conducts a bail hearing in open court.

I affirm, under the penalties for perjury, that the foregoing representations are true.



Michelle Golebiewski
Deputy Prosecuting Attorney