

STATE OF INDIANA)	IN THE ST. JOSEPH SUPERIOR COURT
) SS:	
COUNTY OF ST. JOSEPH)	CAUSE NUMBER. 71
)	
STATE OF INDIANA)	
)	
VS)	SUPPLEMENTAL AFFIDAVIT IN
)	SUPPORT OF PROBABLE CAUSE
AANIYAH MICHELLE NOWLES)	
DOB: 12/28/2001)	

KENNETH P. COTTER, upon information and belief, after being duly sworn upon his oath, says that:

I am the Prosecuting Attorney with the 60th Judicial Circuit, St. Joseph County, State of Indiana. I have reviewed verified South Bend Police reports as well as the criminal history for AANIYAH MICHELLE NOWLES. AANIYAH MICHELLE NOWLES was arrested on April 11, 2022. All events occurred in St. Joseph County, Indiana. I make this affidavit based upon those reports.

According to the reports, on April 11, 2022, officers with the South Bend Police Department observed a Malibu with a false temporary plate. Officers also observed the vehicle driving erratically, nearly striking a number of others as it traveled down the roadway. Based upon these traffic violations, the vehicle was pulled over.

Officers spoke to another driver, who advised that she had nearly been struck by the Malibu as it traveled down the roadway.

The driver of the Malibu was identified as NOWLES. Officers also observed an infant in a car seat in the back, whom NOWLES identified as her daughter, [REDACTED] NOWLES advised officers that she had marijuana in the car. A search of the vehicle uncovered a number of baggies containing a green leafy substance that tested positive for marijuana.

Officers also found a loaded semi-automatic handgun underneath the infant. The handgun was loaded, including a live round in the chamber. According to the officers, "Essentially the loaded handgun had been placed under [REDACTED] and then covered her with the blanket. Due to the position of the gun at any point [REDACTED] could have discharged the gun causing serious bodily injury or even death."

DETENTION CONSIDERATIONS

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

1. the nature and circumstances of the offense;
2. the fact that the defendant is in a position of trust toward the victim and the serious danger presented by this incident.

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

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

A handwritten signature in black ink, appearing to read 'K. P. Cotter', written over a horizontal line.

Kenneth P. Cotter
Prosecuting Attorney