

STATE OF INDIANA) IN THE ST. JOSEPH SUPERIOR COURT
ST. JOSEPH COUNTY) SS: CAUSE NO. 71D0 2-1302-FD-000 0158


STATE OF INDIANA)
VS.)
RAYMOND DANIEL HOLYCROSS)
DOB: 08-01-1983)

INFORMATION FOR THEFT, **FILED**
CLASS D FELONY
FEB 21 2013
St. Joseph Superior Court Clerk

MARK J. ROULE, upon information and belief, affirms under the penalty of perjury that:
On or about the 20th day of November, 2012, in St. Joseph County, State of Indiana,
RAYMOND DANIEL HOLYCROSS did knowingly exert unauthorized control over the
property of Teresa Bridegroom, to-wit: a Nikon camera and lenses, by selling or pawning said
camera at Worldwide Pawn Shop, with the intent to deprive Teresa Bridegroom of any part of
the use or value of the property.

All of which is contrary to the form of the statute in such cases made and provided, to
wit: Indiana Code 35-43-4-2, and against the peace and dignity of the State of Indiana.

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


MARK J. ROULE
CHIEF DEPUTY PROSECUTING ATTORNEY

Probable cause found. Arrest warrant ordered issued. Bond set at \$10,000.00

Corporate surety or \$ 1,000.00 cash in lieu thereof, so found this day the
21ST day of February, 2013, at _____ AM/PM.



JUDGE, ST. JOSEPH SUPERIOR COURT

WITNESSES:

All witnesses listed in police, medical and laboratory reports.

STATE OF INDIANA)	IN THE ST. JOSEPH SUPERIOR COURT
) SS:	
ST. JOSEPH COUNTY)	CAUSE NO. 71D0 <u>2</u> 1302-FD-000 <u>158</u>
STATE OF INDIANA)	
)	
VS.)	SUPPLEMENTAL AFFIDAVIT IN
)	SUPPORT OF PROBABLE CAUSE
RAYMOND DANIEL HOLYCROSS)	
DOB: 08-01-1983)	

FILED -
 FEB 21 2013
 St. Joseph Superior Court
 Clerk

MARK J. ROULE, upon information and belief, affirms under the penalties for perjury, states that:

I am a Chief Deputy Prosecuting Attorney with the 60th Judicial Circuit, St. Joseph County, State of Indiana, and make this affidavit after reviewing verified Mishawaka Police reports which were submitted to me.

On February 16, 2013, Officer Franklin Ennis of the Mishawaka Police Department met with Teresa Bridegroom, who came to the lobby of the Mishawaka Police Department to make a report pertaining to stolen property. Bridegroom reported that her boyfriend, who she identified as "Ray Parris" had stolen and pawned her camera. Bridegroom stated that she had looked into his backpack and located a receipt for the pawn transaction, and that it was in the name of "RAYMOND HOLYCROSS." Bridegroom stated that she subsequently learned that he had several aliases. Bridegroom advised that she had not given him permission to sell her camera. Officer Ennis observed that the receipt provided by Bridegroom showed that the camera, a Nikon D3100 and two lenses, had been sold or pawned at WorldWide Pawn on November 20, 2012.

Detective Michael Cleveland contacted WorldWide Pawn on Lincoln Way East in Mishawaka, Indiana, and received copies of the same receipts, maintained by the business.

Detective Cleveland spoke further with Teresa Bridegroom on February 18th, 2013.

Bridegroom reported that she had been introduced to the subject she knew as "Ray Parris" by a friend, and that ultimately, he moved in with her with the agreement that he would help pay bills in exchange for rent. Bridegroom stated that the initial agreement had been for a month, as he advised that he was in the process of obtaining a new job and residence. Bridegroom advised that after several months, she began to become suspicious of him, and began checking for additional information. Bridegroom reported that, while doing so, she checked a backpack he had been using and located the receipt from WorldWide Pawn. Bridegroom reported that she had previously allowed him to use her camera, but never authorized him to pawn or sell it.

On February 18th, Detective Cleveland spoke with RAYMOND DANIEL HOLYCROSS. HOLYCROSS admitted that he had been introduced to Teresa Bridegroom through a mutual acquaintance, and began to date her thereafter, eventually moving into her apartment. HOLYCROSS admitted that he had sold Bridegroom's camera at a pawn shop, but indicated that he had done so because he planned to purchase a better one for her. HOLYCROSS advised that he had discussed this with Bridegroom, and she had consented to it.

Detective Cleveland spoke further with Bridegroom, and advised her of HOLYCROSS's claim of permission to sell the camera. Bridegroom reiterated that she never consented to the sale of her camera by HOLYCROSS for any purposes.

The State of Indiana asks for a **HIGHER THAN STANDARD BOND** for RAYMOND DANIEL HOLYCROSS for the reason that he is a flight risk. The Mishawaka Police Department (and the Office of the Prosecuting Attorney in St. Joseph County) has received information from the NCIC/III database maintained by federal law enforcement agencies showing an outstanding warrant for RAYMOND DANIEL HOLYCROSS originating in Howard

County, Indiana, as well as law enforcement contacts/advisements from the State of Oregon. In the interview with Detective Cleveland, HOLYCROSS acknowledged returning to Indiana several months previously from the State of Oregon.

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

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



MARK J. ROULE
CHIEF DEPUTY PROSECUTING ATTORNEY