

STATE OF INDIANA ) IN THE ST. JOSEPH SUPERIOR COURT  
) SS:  
ST. JOSEPH COUNTY ) CAUSE NO. 71D0 2 -1606-F5-000121

STATE OF INDIANA ) INFORMATION IN THREE COUNTS:  
) COUNT I: BURGLARY, LEVEL 5 FELONY  
VS. ) COUNT II: BURGLARY, LEVEL 5 FELONY  
) COUNT III: CARRYING A HANDGUN WITHOUT  
BRIAN KEITH JENNINGS ) A LICENSE, CLASS A MISDEMEANOR

DOB: [REDACTED] 1997

**- FILED -**

**JUN 23 2016**

**Clerk  
St. Joseph Superior Court** COUNT I

Sean M. Towner, upon information and belief, affirms under penalty of perjury that:

On or about May 13, 2016 in St. Joseph County, State of Indiana, Brian Keith Jennings did break and enter the building of Kodiak Firing Range & Training Facility with the intent to commit a theft therein.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-43-2-1, 35-43-4-2, 35-41-2-4 and against the peace and dignity of the State of Indiana.

COUNT II

Sean M. Towner, upon information and belief, affirms under penalty of perjury that:

On or about June 21, 2016 in St. Joseph County, State of Indiana, Brian Keith Jennings did break and enter the building of Kodiak Firing Range & Training Facility with the intent to commit a theft therein.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-43-2-1, 35-43-4-2, 35-41-2-4 and against the peace and dignity of the State of Indiana.

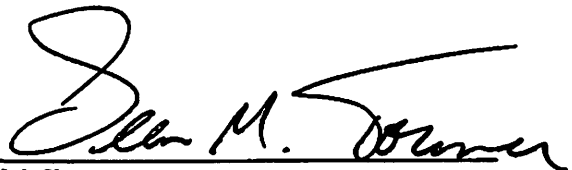
COUNT III

Sean M. Towner, upon information and belief, affirms under penalty of perjury that:

On or about June 21, 2016 in St. Joseph County, State of Indiana, Brian Keith Jennings did knowingly carry a handgun in or upon the defendant's vehicle without ever having been issued a license.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-47-2-1, and against the peace and dignity of the State of Indiana.

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



Sean M. Towner  
Deputy Prosecuting Attorney

Probable cause found. Arrest warrant ordered issued. Bond set at \$ 50,000

Corporate surety or \$ 5000 cash in lieu thereof, so found this day the

23 day of June, 2016, at 11:15 (A)M/PM.



JUDGE, ST. JOSEPH SUPERIOR COURT

**WITNESSES:**

**Julie Pemberton**

**Cody Diment**

**John Clinton**

**Officer Darren Tucker, SBPD**

**Officer Joseph Slabach, SBPD**

**Officer Briar Johnston, SBPD**

**Officer John Riddle, SBPD**

**Officer Brandon Martin, SBPD**

**Officer Jeff Cummins, SBPD**

**Officer Steve Noonan, SBPD**

**Officer Molly O'Blenis, SBPD**

**Officer Ryan Hiipikka, SBPD**

**Officer John Gast, SBPD**

**Officer Eric Mentz, SBPD**

**Ray Wolfenbarger, SBPD**

**Fingerprint expert**

**Forensic Scientist**

**Detective Slager**

**Detective Ryans**

**Task Force Agent Scott**

**Special Agent Allbritten**

STATE OF INDIANA )  
ST. JOSEPH COUNTY )  
STATE OF INDIANA )  
VS. )  
BRIAN KEITH JENNINGS )  
DOB: [REDACTED] 1997 )

IN THE ST. JOSEPH SUPERIOR COURT  
SS: CAUSE NO. 71D0 2 -1606-F5- 000121

SUPPLEMENTAL AFFIDAVIT IN  
SUPPORT OF PROBABLE CAUSE

**- FILED -**

**JUN 28 2016**

**Clerk  
St. Joseph Superior Court**

Sean M. Towner, upon information and belief after being duly sworn upon his oath says that:

I am a Deputy Prosecuting Attorney with the 60th Judicial Circuit, St. Joseph County, State of Indiana. I have reviewed verified South Bend Police reports and spoken with Federal and State officers whom investigated these offenses and also reviewed BRIAN KEITH JENNINGS criminal. BRIAN KEITH JENNINGS was arrested on June 21, 2016. All events occurred in St. Joseph County, Indiana. I make this affidavit based upon those reports.

According to the reports, on June 21, 2016, officers were dispatched to the Kodiak Firing Range & Training Facility in regards to a burglary in progress. As they were arriving, dispatched advised that someone had driven into a gun shop. When they arrived they spoke with two (2) witnesses who advised that they observed a Jeep smash into the door and a number of suspects from the Jeep entered the firing range. A very short time later, those individuals got back into the Jeep and fled.

The firing range has a video camera system. A review of the system shows that a Jeep smashes through the front door and a number individuals get out of the Jeep, ransacked the establishment by taking rifles, handguns, and ammunition, and fleeing the store. It was later

THE NATIONAL ARCHIVES

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determined that a total of 27 firearms were taken during the burglary. John Pemberton, the manager of the store, advised that he did not give anyone permission to do so.

Officers were able to gather a description of the Jeep and a short time later observed that same Jeep commit a traffic violation in South Bend. Officers attempted to pull the vehicle over but it fled for a short distance. The vehicle then stopped and a number of individuals fled the Jeep. Officers seized the Jeep and inside found a person later identified as BRIAN JENNINGS. JENNINGS was advised of his rights and he waived the same. JENNINGS admitted to being involved in the burglary of the firing range.

Inside the Jeep were a rifle and 7 handguns. JENNINGS does not have a license to carry a handgun. The investigation concerning the other individuals is ongoing.

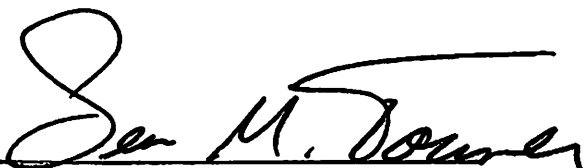
JENNINGS was thereafter interviewed by Special Agent Allbritten and Task Force Agent Scott of the Bureau of Alcohol, Tobacco, Firearms, and Explosives. JENNINGS again acknowledged having participated in the burglary of Kodiak Firing Range & Training Facility that night. JENNINGS stated the purpose of the burglary was to obtain numerous firearms which would be used to retaliate against certain individuals who had recently shot an associate of JENNINGS while other firearms would be later sold. JENNINGS acknowledged that the plan to burglarize Kodiak was his plan. JENNINGS also admitted that he was driving the vehicle when it crashed through the front of Kodiak's building. JENNINGS stated he and three other individuals entered the store while wearing their shirts tied around their faces.

This was not the first time Kodiak was burglarized where a vehicle smashed through the storefront. Kodiak was also burglarized on May 13, 2016. JENNINGS also admitted to having participated in that burglary. JENNINGS admitted he was driving the vehicle that day which

was used to smash through the front Kodiak. JENNINGS stated he was accompanied that day by two individuals. After JENNINGS drove through the storefront, the other two individuals exited the car and entered Kodiak and stole one firearm. JENNINGS stated the group was quickly frightened away from the scene and fled.

The State of Indiana requests a **HIGHER THAN STANDARD BOND** for JENNINGS as he poses a danger to our community. JENNINGS has now committed two burglaries of gun stores in roughly a six-week time period. Further, JENNINGS stated that the purpose of the second burglary was to not only acquire weapons for retaliation purposes, but also to illegal sell firearms. Given these facts, the State believes JENNINGS presents a danger to the community.

All of the above mentioned events occurred in St. Joseph County, State of Indiana. I affirm under the penalties for perjury that the foregoing representations are true.

  
Sean M. Towner  
Deputy Prosecuting Attorney