

STATE OF INDIANA            )  
  )ss:  
COUNTY OF CARROLL        )  
  
STATE OF INDIANA            )  
  )  
vs.                                 )  
  )  
RICHARD M. ALLEN            )

IN THE CARROLL CIRCUIT COURT

CAUSE NO. 08C01-2210-MR-000001

**DEFENDANT’S ADDITIONAL FRANKS NOTICE**

Comes now the accused, Richard Allen, by and through counsel Andrew Baldwin and Brad Rozzi and files the following additional information to supplement the Franks motion and memorandum previously filed with this Court on October 18, 2023. In support of said notice, the Defense states the following:

1. That on September 18, 2023, the Defense filed its motion for Franks hearing as well as a memorandum in support of said motion.
2. That since filing that motion, the Defense has received new discovery that strongly supports the Defense’s belief that Tony Liggett and Unified Command attempted to conceal from Judge Diener (and has since even attempted to hide from the Defense) that evidence supports that those practicing Odinism were the murderers of Abby and Libby.
3. Specifically, Tony Liggett swore under oath at his August 8, 2023, deposition that a Purdue professor did **not** believe that the sticks found on Abby’s and Libby’s bodies consisted of “runes.” (Liggett depo. pages 74-77)
4. Furthermore, Sgt. Jerry Holeman swore under oath at his August 10, 2023, deposition that a Purdue professor said that the sticks found on the girls did **not** represent “Odinism or any type of cult worshipping or any type of a group that would have conducted the crime.” (Holeman depo. p. 63, lines 10-20).
5. Because of the findings of this Purdue professor the Unified Command claimed to have essentially abandoned the Odinism aspect of the investigation into the murders of Abby and Libby.
6. In response to the Defense request to depose this Purdue professor, on September 6, 2023 the prosecutor Nick McClelland told the Defense via email: “As stated before we are trying to identify the Purdue professor, but no luck yet. Detective Holeman has reached out to the FBI and Purdue and

has not gotten a response yet. We will continue our endeavors but may not be able to identify him/her.”

7. However, on September 19, 2023 (the day after the Franks memorandum was filed, where it was revealed that the Purdue professor was “missing”) *miraculously* Jerry Holeman found the professor whose name is Jeffrey Turco and interviewed him.
8. However, in the interview, Jerry Holeman apologized to Turco for the **3-4 weeks that it took him (Holeman) to sit down and talk with Turco.**
9. This means that Holeman was aware of the Purdue professor’s identity since mid-to-late August but nonetheless told Nick McClelland that Unified Command could not locate the Purdue professor and furthermore that they may not ever be able to find the Purdue professor.
10. However, after it was obvious that the Purdue professor would probably “out” himself as the missing Purdue professor following the Franks memorandum, Holeman went and interviewed the Purdue professor the day after the Franks memorandum was filed.
11. Why would Holeman and the Unified Command try to hide the name of the Purdue professor, even risking ridicule for the absurdity that they could not remember his name? The answer is obvious once the taped statement was played:
  - a. Dr. Turco stated that after viewing the pattern of the sticks on the girls that “it was a given” that someone was trying to replicate a Germanic runic script.
  - b. Furthermore, Dr. Turco consulted with a colleague from Harvard who had even more knowledge on runes, and this Harvard professor was in agreement with Turco.
  - c. Furthermore, Dr. Turco stated that Odinism is an extreme neo-Pagan/neo-Heathenism ideology that has right wing racist connotations.
  - d. Furthermore, Dr. Turco stated that according to 19<sup>th</sup> century sources that Vikings practiced ritual killings and sacrifices.
  - e. Furthermore, Dr. Turco stated that although he could not necessarily interpret these runes, that the stick configurations were pretty clearly runic and that he “**could certainly imagine that this was somebody’s idea that when you do human sacrifice you carve runes...**there are some poetic sources that would sort of support that

idea that somebody might have come across...that scenario seems entirely plausible to me.” (Turco taped statement 15:00 -15:50).

- f. Furthermore, Dr. Turco discussed how runes were thought to have “magical significance and would be used in incantations, in **rituals and that there is a sacrificial connection in mythological poetry**...these were things again where somebody who was sort of an Odin ‘fanboy’ would likely come across.” (Turco taped statement 14:40-15:00)
12. That on September 8, September 18, September 21 and September 27, 2023, the State of Indiana made available to the Defense a total of 14 hard drives, 5 flash drives, 3 discs and what appear to be hundreds of pages of paperwork.
13. Particularly contained in the State of Indiana’s September 27, 2023, evidence drop, was a thumb drive that contained an interview of a “Jeffrey Turco.” (not marked as a Purdue professor).
14. It seems apparent by the timing of events that Tony Liggett and Unified Command knew the Purdue professor’s name and wanted to hide his name and his findings from the Defense as Turco’s conclusions supported the Defense and opposed the prosecution and Liggett’s and Holeman’s sworn statements. Therefore, apparently in what seems like a complete hair-brained scheme, Holeman and Liggett decided to claim that they did not know the professor’s name hoping that this would put an end to the Defense looking into the Purdue professor. However, once the memorandum made it clear that the Purdue professor would certainly be found at some point in time, it took Holeman one day to locate Dr. Turco and interview him about his findings of 2017.
15. Again, Franks requires a preliminary finding that law enforcement has acted intentionally or with reckless disregard for the truth when being accused of concealing evidence from the Judge who signed the warrant. It would be difficult to find a more outrageous set of facts to support that Liggett and the Unified Command intentionally concealed the Odinite information from Judge Diener. If Liggett and Unified Command were willing to try to get away with concealing a Purdue professor from Defense counsel then it is easy to see that they would have no problem concealing all the evidence detailed in the Franks memorandum from Judge Diener as well.

WHEREFORE, Defense counsel respectfully files his additional Franks notice and would request that this Court factor in this new filing into its ruling on the Defense request for a Franks hearing.

Respectfully Submitted,



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Andrew J. Baldwin, #17851-41  
Attorney for Defendant

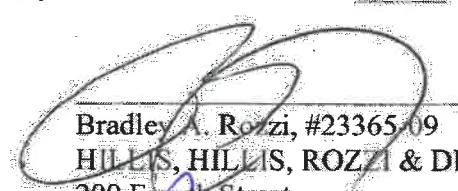


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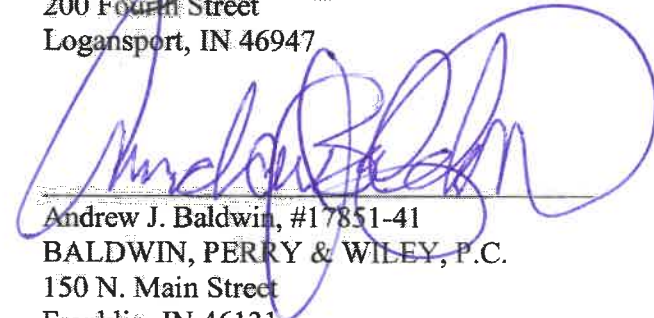
**CERTIFICATE OF SERVICE**

I certify that I have served a copy of this document by the County e-filing system upon the Carroll County Prosecutor's Office the \_\_\_\_\_ day of September, 2023.



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