

IN THE CIRCUIT COURT OF CARROLL COUNTY

STATE OF INDIANA)
)
 VS.) NO: 08C01-2210-MR-000001
)
 RICHARD M. ALLEN)
)

AFFIDAVIT

- 1) On 11-19-23 I accompanied attorneys Robert Scremin and William Lebrato to the Westville Correctional Facility to meet with Richard Allen.
- 2) After arrival at the facility, it took approximately an hour to clear security and reach Mr. Allen, which included riding in a shuttle van to an interior wing of the prison.
- 3) We met with Mr. Allen in a room lined with windows where prison guards could plainly observe the “confidential” consultation. The door to the room was left ajar and could not be closed, as the door’s deadbolt was left protruding from the door preventing it from closing. Prison guards remained posted just outside the door where they could look through the windows. Mr. Allen appeared apprehensive to speak freely with attorneys Scremin and Lebrato.
- 4) Richard Allen was brought to the room wearing ankle shackles, handcuffs and a wide leather belt fitted with metal O-rings. The ankle shackles and handcuffs were both secured to the waist belt by short chains, which restricted Mr. Allens every move and gave him the appearance of Hannibal Lecter. His hands were cuffed together such that

the back of his hands were together with one palm facing down and one palm facing up. Mr. Allen appeared visibly uncomfortable, with his arms twisted at the elbow such that the backs of his hands could be secured facing each other in the handcuffs. *Mr. Allen remained shackled and chained in this fashion for the entire visit.*

- 5) One of the prison guards who stood outside the door, later identified as (*redacted*), displayed a *face tattoo* of “Odin’s Spear” under his right eye, and numerous tattoos on his arms, hands and fingers that resembled Nordic and/or Odinit symbols.
- 6) I later located a Facebook profile for (*redacted*), including a photo of (*redacted*) with the same face tattoo of “Odin’s Spear” and wearing a necklace with a “Thor’s Hammer” charm, another symbol associated with Odinism. The hammer necklace worn by (*redacted*) was inscribed with the letters “BRSRCR” which is an acronym for “berserker.” A berserker is a type of Nordic battle axe and a term used to described warriors fighting for Odin. Other photos displayed three interlocking triangles; another symbol associated with Odinism.
- 7) Research has revealed that Odinism has been linked to white supremacy in the prison system. Symbols and rituals associated with Odinism also appear to be present in crime scene photos taken in the present case.
- 8) Mr. Allen stated that he was once shot with a taser through a closed and locked prison cell door.
- 9) Mr. Allen stated that when it was time for him to take a shower or have recreation time, the guards would ask him if he wanted a shower or recreation, but they would slowly shake their heads from side to side, indicating that his response should be “no” because it was an inconvenience for the guards to assist with these basic amenities.

- 10) On 12-22-23, I accompanied attorneys Scremin and Lebrato to Wabash Valley Correctional Facility, where Mr. Allen had recently been moved. The round-trip drive and visit took over 10 hours to complete.
- 11) Once at the facility, it again took approximately an hour just to get to Mr. Allen.
- 12) Prison staff indicated they did not have any type of visitation rooms for the attorneys to use, because they were not equipped for such matters, but had fashioned a visitation room in some sort of prep-kitchen within the prison housing unit.
- 13) We were informed by prison staff that there were video cameras recording the visit.
- 14) We were taken to Mr. Allen, who was secured in a prison cell located within this kitchen area. The cell appeared to be designed as a place to feed a prisoner. The cell had a solid iron door with a small, hinged iron flap approximately eight inches high, that opened just far enough to slide a food tray through. This iron flap was left open, and it was through this small opening that we were allowed to see Mr. Allen and speak with him. A folding table was set up approximately six feet from the cell door with three chairs on the far side of the table. We were instructed to sit in the chairs and not to come within six feet of the cell door. This set-up made it impossible to show Mr. Allen any videos or discuss any documents.
- 15) Mr. Allen confirmed he had recently spoken with attorney (*redacted*) by telephone concerning the upcoming Supreme Court hearing. Mr. Allen appeared confused about his legal representation and was hesitant to share information about his case with attorneys Scremin and Lebrato, suggesting that he was waiting for the result of the January 18, 2024, Oral Argument. I have also recently spoken with Mr. Allen's wife, who similarly was hesitant to provide any information until after the hearing.

- 16) Mr. Allen stated that since arriving at Wabash Valley Correctional Facility, he had been kept in solitary confinement, had not had any recreational time, and had not been allowed outside, and that he had no window. Although he had been there nearly two weeks, he believed he had taken one, perhaps two showers. He appeared disoriented to date or time. Prison officials confirmed that Mr. Allen had not been taken outside for recreational time, claiming it was a safety issue for “suicide watch.”
- 17) Mr. Allen expressed concern that he was receiving medications and that he was unsure what he was being given or why, as he had not recently seen a physician. He also stated that whatever medication he receives, he does not always get the same type or number or size or color of pills.

Respectfully submitted by,

/s/ *Suzanne Moller*

Investigator

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