

STATE OF INDIANA)
) SS:
COUNTY OF VANDERBURGH)

STATE OF INDIANA

VS

WILLIAM HOWARD MARVER

W/M

DOB: 9/1/1958

SSN: REDACTED

DLN: 8944-33-2969

FBI: 584336HA3

5'07" - 215

1725 RIVERVIEW CT

EVANSVILLE, IN 47712

IN THE VANDERBURGH SUPERIOR COURT
CIRCUIT

CAUSE NUMBER. 82D03/C01-1505-F4-

INFORMATION FOR:

COUNT 1:

CONSPIRACY TO COMMIT ARSON

a Level 4 Felony

AGENCY: INDIANA DEPARTMENT OF
NATURAL RESOURCES

I.C. 35-43-1-1(a)(2) and I.C. 35-41-5-2

COUNT 2:

CONSPIRACY TO COMMIT ARSON FOR
HIRE

a Level 4 Felony

AGENCY: INDIANA DEPARTMENT OF
NATURAL RESOURCES

I.C. 35-43-1-1(b) and I.C. 35-41-5-2

COUNT 3:

ARSON WITH INTENT TO DEFRAUD

a Level 6 Felony

AGENCY: INDIANA DEPARTMENT OF
NATURAL RESOURCES

I.C. 35-43-1-1(c)

VANDERBURGH CIRCUIT COURT
★ FILED ★
MAY 18 2015
Debra A. Stucke
CLERK

Count 1:

The undersigned, being duly sworn upon his oath, says that in Vanderburgh County, State of Indiana, between January 24, 2015 through February 14, 2015, William Howard Marver with the intent to commit a felony of Arson agreed with Brenda Harris to commit the aforesaid crime of Arson; and that either the above listed defendant or Brenda Harris performed one or more of the following overt acts in furtherance of the agreement:

1. On or about January 24, 2015, William Marver and Brenda Harris discuss each of their financial problems via Facebook resulting in William Marver advising Brenda Harris that he has a plan but would

need to meet in person to discuss and/or

2. On or about February 10, 2015, William Marver advises Brenda Harris via Facebook that he "needs the work they talked about done." The two then discuss obtaining a kerosene heater and/or

3. William Marver and Brenda Harris each would advise investigators that William Marver was going to pay Brenda Harris to clean his house boat to get it ready for sale and/or

4. On February 12, 2015, Brenda Harris advises that she and Zachary Patrick began removing items from the house boat of William Marver and/or

5. On February 12, 2015, William Marver gave Brenda Harris three space heaters, one kerosene heater and a jug of kerosene fuel and/or

6. On February 13, 2015, Brenda Harris, Zachary Patrick and Cory Boling, continue removing items from the house boat of William Marver, including a wall mounted television and a wall mounted stereo system. A truck load of items were taken to the residence of William Marver and/or

7. On February 13, 2015, William Marver stated he brought garbage bags to the boat and that Brenda Harris had all the beds stripped, bathrooms cleaned, and that Brenda Harris was on her way to having the boat ready to sell and/or

8. Brenda Harris would later tell investigators that she did not clean the boat but rather just removed items and/or

9. William Marver would later tell investigators that the house boat is insured by Allstate Insurance Company and/or

10. On February 13, 2015, Brenda Harris asks Zachary Patrick and Cory Boling to go up on top of the boat to flip a breaker. While Cory Boling and Zachary Patrick are outside the boat, Brenda Harris moves the kerosene heater and a jug of kerosene fuel to the hallway and a fire is started and/or

11. Zachary Patrick extinguishes the fire. Cory Boling moved the jug of kerosene fuel away from the kerosene heater. Approximately ten (10) minutes later, as Cory Boling and Zachary Patrick were outside, sitting on the stairs of the boat, Brenda Harris exits the boat and Cory Boling notices that the interior hallway of the boat was on fire. This fire was much larger than the basketball sized fire earlier and/or

12. Cory Boling further advises that Brenda Harris stated, "we all need to be telling the same story", "you understand I did what I had to do", and "but don't worry, you will get paid" and/or

13. Brenda Harris and William Marver were on the phone with each other several times during that night and/or

14. Brenda Harris would later tell investigators that she works 1 or 2 days a week at Dollar General Store and that she does cleaning, including cleaning for William Marver and/or

15. Brenda Harris initially tells investigators that she needed cash and agreed to clean the boat of William Marver to prepare it for sale and/or

16. Brenda Harris later acknowledges that she really didn't clean but removed items from the boat and/or

17. Brenda Harris initially denied being on the boat when the fire was re-started. However, when investigators advised they knew she was inside the boat when the fire was re-started, she said, "ok, ok", and then did not deny being on the boat when the fire was re-started and/or

18. Brenda Harris advised she did not come up with the plan to start the fire and/or

19. An investigation of the Marver boat revealed that a one pint metal chemical container had been wedged underneath the safety cage of the kerosene heater. Cory Boling was again interviewed and advised that he did not see any articles or items wedged underneath the safety cage of the kerosene heater the night of the fire and/or

20. On February 16, 2015, William Marver text's Brenda Harris via Facebook "Love you pumpkin!" and/or

21. On February 17, 2015, William Marver and Brenda Harris communicated via Facebook and William Marver tells Brenda Harris that he spoke with investigators about the boat fire. William Marver texted Brenda Harris "I did tell them I had agreed to pay you 200 and that I paid it cash when I saw you after the fire...." then texted to Brenda "They (investigators) asked if I was having you move everything off(f) the

boat. I laughed. Like you would do all that for 200!!" and/or

22. Allstate Insurance Company advises that William Marver has initiated the claim process for the loss and/or

23. William Marver had shown investigators a hand written list of items of value that were on the boat when it caught fire which included a \$10,000 installed stereo system and/or

24. Timothy Cummings lived in a house boat located only 75 to 100 feet from the house boat of William Marver, contrary to the form of the statutes in such cases made and provided by I.C. 35-43-1-1(a)(2) and I.C. 35-41-5-2 and against the peace and dignity of the State of Indiana.

Count 2:

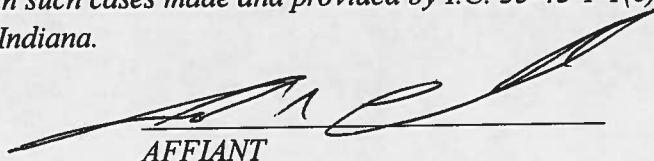
The undersigned, being duly sworn upon his oath, says that in Vanderburgh County, State of Indiana, between January 24, 2015 through February 14, 2015, William Howard Marver with the intent to commit a felony of Arson for Hire agreed with Brenda Harris to commit the aforesaid crime of Arson for Hire; and that either the above listed defendant or Brenda Harris performed one or more of the following overt acts in furtherance of the agreement:

1. On or about January 24, 2015, William Marver and Brenda Harris discuss each of their financial problems via Facebook resulting in William Marver advising Brenda Harris that he has a plan but would need to meet in person to discuss and/or
2. On or about February 10, 2015, William Marver advises Brenda Harris via Facebook that he "needs the work they talked about done." The two then discuss obtaining a kerosene heater and/or
3. William Marver and Brenda Harris each would advise investigators that William Marver was going to pay Brenda Harris to clean his house boat to get it ready for sale and/or
4. On February 12, 2015, Brenda Harris advises that she and Zachary Patrick began removing items from the house boat of William Marver and/or
5. On February 12, 2015, William Marver gave Brenda Harris three space heaters, one kerosene heater and a jug of kerosene fuel and/or
6. On February 13, 2015, Brenda Harris, Zachary Patrick and Cory Boling, continue removing items from the house boat of William Marver, including a wall mounted television and a wall mounted stereo system. A truck load of items were taken to the residence of William Marver and/or
7. On February 13, 2015, William Marver stated he brought garbage bags to the boat and that Brenda Harris had all the beds stripped, bathrooms cleaned, and that Brenda Harris was on her way to having the boat ready to sell and/or
8. Brenda Harris would later tell investigators that she did not clean the boat but rather just removed items and/or
9. William Marver would later tell investigators that the house boat is insured by Allstate Insurance Company and/or
10. On February 13, 2015, Brenda Harris asks Zachary Patrick and Cory Boling to go up on top of the boat to flip a breaker. While Cory Boling and Zachary Patrick are outside the boat, Brenda Harris moves the kerosene heater and a jug of kerosene fuel to the hallway and a fire is started and/or
11. Zachary Patrick extinguishes the fire. Cory Boling moved the jug of kerosene fuel away from the kerosene heater. Approximately ten (10) minutes later, as Cory Boling and Zachary Patrick were outside, sitting on the stairs of the boat, Brenda Harris exits the boat and Cory Boling notices that the interior hallway of the boat was on fire. This fire was much larger than the basketball sized fire earlier and/or
12. Cory Boling further advises that Brenda Harris stated, "we all need to be telling the same story", "you understand I did what I had to do", and "but don't worry, you will get paid" and/or
13. Brenda Harris and William Marver were on the phone with each other several times during that night and/or

14. Brenda Harris would later tell investigators that she works 1 or 2 days a week at Dollar General Store and that she does cleaning, including cleaning for William Marver and/or
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17. Brenda Harris initially denied being on the boat when the fire was re-started. However, when investigators advised they knew she was inside the boat when the fire was re-started, she said, "ok, ok", and then did not deny being on the boat when the fire was re-started and/or
18. Brenda Harris advised she did not come up with the plan to start the fire and/or
19. An investigation of the Marver boat revealed that a one pint metal chemical container had been wedged underneath the safety cage of the kerosene heater. Cory Boling was again interviewed and advised that he did not see any articles or items wedged underneath the safety cage of the kerosene heater the night of the fire and/or
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21. On February 17, 2015, William Marver and Brenda Harris communicated via Facebook and William Marver tells Brenda Harris that he spoke with investigators about the boat fire. William Marver texted Brenda Harris "I did tell them I had agreed to pay you 200 and that I paid it cash when I saw you after the fire...." then texted to Brenda "They (investigators) asked if I was having you move everything of(f) the boat. I laughed. Like you would do all that for 200!!" and/or
22. AAllstate Insurance Company advises that William Marver has initiated the claim process for the loss and/or
23. William Marver had shown investigators a hand written list of items of value that were on the boat when it caught fire which included a \$10,000 installed stereo system, contrary to the form of the statutes in such cases made and provided by I.C. 35-43-1-1(b) and I.C. 35-41-5-2 and against the peace and dignity of the State of Indiana.

Count 3:

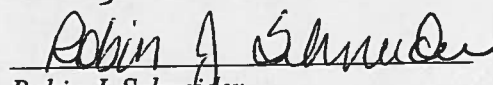
The undersigned, being duly sworn upon his oath, says that in Vanderburgh County, State of Indiana, between January 24, 2015 through February 14, 2015, William Howard Marver did by means of fire knowingly damage the property of William Marver, to-wit: house boat; and did so with the intent to defraud, contrary to the form of the statutes in such cases made and provided by I.C. 35-43-1-1(c) and against the peace and dignity of the State of Indiana.


AFFIANT

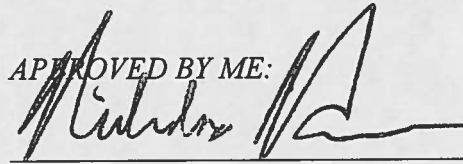
Subscribed and sworn to before me this 18th day of May, 2015.

My commission expires:
September 08, 2015

WITNESSES:
REDACTED


Robin J. Schneider
Notary Public
A Resident of Warrick County

APPROVED BY ME:



NICHOLAS G. HERMANN

Prosecuting Attorney

I/We hereby certify that the foregoing document
complies with the requirements of Trial Rule
5(G) with regard to information excluded from
public record under Administrative Rule 9(G).



Deputy Prosecuting Attorney