

STATE OF INDIANA ) IN THE ST. JOSEPH SUPERIOR COURT  
 ) ) SS: CAUSE NUMBER. 71  
COUNTY OF ST. JOSEPH )  
)  
STATE OF INDIANA ) INFORMATION IN ONE COUNT:  
)  
VS ) COUNT I:  
) RECKLESS HOMICIDE  
JASON LEE COLLINS ) A LEVEL 5 FELONY  
DOB: 4/9/1979 )

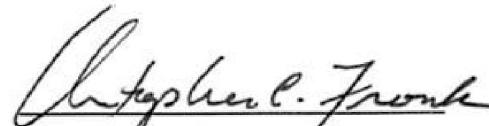
COUNT I

CHRISTOPHER C. FRONK, upon information and belief, affirms under penalty of perjury that:

On or about September 29, 2019 in St. Joseph County, State of Indiana, Jason Lee Collins did recklessly kill another human being, to wit: Trey Martinez; by stabbing him with a knife.

All of which is contrary to the form of the statutes in such cases made and provided by I.C. 35-42-1-5 , and against the peace and dignity of the State of Indiana.

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



Christopher C. Fronk  
CHIEF DEPUTY PROSECUTING ATTORNEY

Probable cause found. Arrest Warrant Issued.

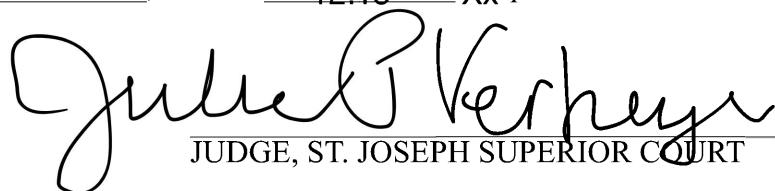
Pursuant to Criminal Rule 26 and the St. Joseph County Release/Detention Matrix, Defendant ordered released on recognizance with a promise to appear. Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

Defendant to be held for initial bail hearing on \_\_\_\_\_ day of \_\_\_\_\_, 2019 at 1:00 p.m.

Defendant to be held for next available bail hearing after the warrant is served.

Bond set in the amount of \_\_\_\_\_ corporate surety or \_\_\_\_\_ cash. Defendant subject to any conditions listed in the attached Pretrial Supervision Order.

So found this 15 day of October, 2019 at 12:15 xx/pm.



JULIE P. VERHEYEN  
JUDGE, ST. JOSEPH SUPERIOR COURT

WITNESSES:

Trey Martinez  
Asst. Cmdr. Alex Arendt  
Cody Banks  
Samuel Chaput South Bend Police Department  
Kenneth Cornelis St. Joseph County Sheriff's Department  
Anthony Dertz South Bend Police Department  
Kevin Gibbons South Bend Police Department  
Alexander Gutierrez South Bend Police Department  
Gery Mullins  
Michael Norby South Bend Police Department  
Marshall Onnink South Bend Police Department  
D S  
Z S  
Diane M. Schubert  
Desmoneek L Smith  
Joseph Snyder  
David Turk South Bend Police Department  
Michael Vanvynckt South Bend Police Department  
Scott Wagner M.D.  
Mark Walsh South Bend Police Department  
Timothy Wiley South Bend Police Department  
All witnesses listed in police, medical and laboratory reports

STATE OF INDIANA	)	IN THE ST. JOSEPH SUPERIOR COURT
	) SS:	
COUNTY OF ST. JOSEPH	)	CAUSE NUMBER. 71
	)	
STATE OF INDIANA	)	
	)	
VS	)	SUPPLEMENTAL AFFIDAVIT IN
	)	SUPPORT OF PROBABLE CAUSE
JASON LEE COLLINS	)	
DOB: 4/9/1979	)	

Christopher C. Fronk, upon information and belief and affirming 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. I have reviewed the South Bend Police and County Metro Homicide investigations as well as the criminal history for JASON LEE COLLINS. I make this affidavit based upon those reports.

Around dawn on September 29, 2019 South Bend officers were dispatched to the area of Marine Street, South Bend, St. Joseph County, IN for a man down in the street. On arrival of officers and medics, the man, Trey Martinez was confirmed dead. In canvassing the area, Homicide investigators found a bloodstain on the inside of a glass storm door at 1406 South Marine Street, which is down the block from where Martinez was found. Two juveniles were in the home, and were interviewed. Two adults residents of the home were located at another home and interviewed. One of those adults was JASON COLLINS.

COLLINS stated that he and the victim, Martinez, had been together throughout the night and early morning, along with others. In the early morning COLLINS, Martinez and Diane Schubert were sitting around a table in Schubert's home. After a brief verbal altercation, COLLINS claimed that Martinez went around the table and pushed him back in his chair and was trying to push on his neck or choke him. COLLINS pulled a folding knife from his pocket and stabbed Martinez once in the neck. Martinez staggered back and left the house.

COLLINS and Schubert showered, laundered their clothes, and directed the two juveniles to clean up the blood while COLLINS and Schubert went for a walk, to a diner for coffee, and then ultimately to a relative's house for more coffee where the police tracked them down. When police asked if the pair knew why officers wanted to speak with them, both COLLINS and Schubert had no idea. Neither COLLINS or Schubert attempted to call police or 9-1-1 to report the stabbing, or to call the victim's father who is first cousins with

both COLLINS and Schubert and had been with the group earlier that night.

An autopsy confirmed that Trey Martinez died as a result of a single stab wound to the neck.

All of the above occurred in St. Joseph County, Indiana.

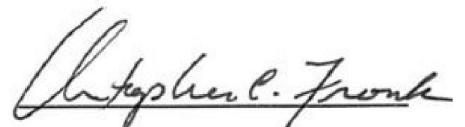
**DETENTION CONSIDERATIONS**

The Defendant is a a substantial flight risk or a danger to self, others or the community for the following reasons:

1. The Defendant is alleged to have committed a crime of violence by stabbing a distant relative to death.

WHEREFORE, the State requests that the Court detain the Defendant until the Court conducts a bail hearing in open court.

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



Christopher C. Fronk  
Chief Deputy Prosecuting Attorney