

STATE OF INDIANA)
) SS:
COUNTY OF HANCOCK)

IN THE HANCOCK SUPERIOR COURT 2

CAUSE NUMBER. 30D02-2302-F6

STATE OF INDIANA

INFORMATION FOR:

VS

TONYA RACHELLE VORIS
DOB: 12/8/1970
OLN: 8938601560

Count I:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count II:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count III:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count IV:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count V:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count VI:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count VII:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count VIII:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count IX:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count X:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count XI:
Neglect of a Dependent
I.C. 35-46-1-4(a)(1)
a Level 6 Felony

Count XII:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count XIII:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count XIV:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count XV:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count XVI:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count XVII:
Reckless Supervision by a Child Care Provider
I.C. 35-46-1-4.1(b)
a Class B Misdemeanor

Count I:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of K.P., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of K.P. and/or without the consent of K.P.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of K.P. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count II:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of K.P., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of K.P. and/or without the consent of K.P.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of K.P. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count III:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of R.H., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of R.H. and/or without the consent of R.H.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of R.H. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count IV:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of R.H., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of R.H. and/or without the consent of R.H.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of R.H. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count V:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of M.C., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of M.C. and/or without the consent of M.C.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of M.C. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count VI:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of M.M., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of M.M. and/or without the consent of M.M.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of M.M. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count VII:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of J.G., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of J.G. and/or without the consent of J.G.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of J.G. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count VIII:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of C.B., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of C.B. and/or without the consent of C.B.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of C.B. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count IX:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of J.B., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of J.B. and/or without the consent of J.B.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of J.B. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count X:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of E.G., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of E.G. and/or without the consent of E.G.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of E.G. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count XI:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris having the care of L.K., a dependent, did knowingly place said dependent in a situation that endangered the dependent's life or health, to-wit: administering a melatonin supplement intended for children over the age of L.K. and/or without the consent of L.K.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of L.K. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4(a)(1) and against the peace and dignity of the State of Indiana.

Count XII:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris, a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the

consent of G.B's parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of G.B., contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

Count XIII:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris , a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the consent of E.M's parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of E.M. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

Count XIV:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris , a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the consent of O.K.s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of O.K. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

Count XV:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris , a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the consent of M.C.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of M.C. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

Count XVI:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris , a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the consent of B.G.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of B.G. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

Count XVII:

The undersigned, being duly sworn upon oath, says that between December 15, 2022 and January 31, 2023 in Hancock County, State of Indiana, Tonya Rachelle Voris , a child care provider, did recklessly supervise a child, in that the said Tonya Rachelle Voris did administer a melatonin supplement without the consent of L.T.'s parent or guardian and/or without full knowledge of any medications, and/or conditions, and/or allergies of L.T. contrary to the form of the statutes in such cases made and provided by I.C. 35-46-1-4.1(b) and against the peace and dignity of the State of Indiana.

I affirm under the penalties for perjury that the foregoing representations are true to the best of my knowledge and belief.

/s/ Abigail Jessup
Abigail Jessup, #37544-30
Prosecutor/Deputy Prosecutor

WITNESSES:

Luke P. Mercuri
Mark Waggoner
K.P.
K.P.
R.H.
R.H.
M.C.
M.M.
J.G.
C.B.
J.B.
E.G.
L.K.
G.B.
E.M.
O.K.
M.C.
B.G.
L.T.
Lindsey Buck
David Michael Faulk
Leslie Hollis
Amy Molloy
John Molloy
Ashley Pugh
Shane Pugh
Kyle Ragan
Sara Ragan
Lynette Sue Shepard
Grabrielle Tucker
Michael Tucker

STATE OF INDIANA)	HANCOCK
COUNTY OF HANCOCK)	CAUSE 30
)	
STATE OF INDIANA)	
VS)	
)	
Tonya Rachelle Voris)	
)	
DOB: 12/08/1970)	
OLN: 8938-60-1560)	

AFFIDAVIT FOR PROBABLE CAUSE

Comes now the Affiant, and swears or affirms that he believes, and has probable cause for the arrest of Tonya Rachelle Voris on or about the 6th day of February, 2023, in Hancock County, Indiana.

In support of this belief, the affiant would show the Court as Follows:

1. The affiant is an officer of the Cumberland Metropolitan Police Department (CMPD)
2. That while engaged in their duties:

On January 31, 2023, at 6:00pm, Officer L. Mercuri (44316) with the Cumberland Metropolitan Police Department (CMPD) was dispatched to the Cumberland Police Station, located at 11501 E. Washington Street, Cumberland, IN on a report of a potential child neglect situation that had occurred at the New Life Church, located at 501 N. Buck Creek Road, Cumberland, Hancock County, IN.

Officer Mercuri made contact with the complainant who is the Pastor of the church, David M. Faulk. Faulk reported that the New Life Church operates a day care business under the name Kidz Life Childcare Ministry as part of the church's services. Faulk explained that the daycare is responsible for roughly 40 children ranging from infants to 4-years-old. Kidz Life Childcare Ministries is an unlicensed, registered ministry with the State of Indiana under Facility Number RM-101323-A.

Faulk reported that on January 29, 2023, the Assistant Director of the daycare, Lynnette Shepard (W/F DOB: [REDACTED]), had come to him and expressed concerns of pediatric strength melatonin being administered to the children without parental consent by the daycare's Director, Tonya R. Voris (W/F DOB: [REDACTED]). Faulk stated that

Shepard explained to him that beginning in December of 2022, a parent advised Director Voris to provide their child with a specific amount of pediatric strength melatonin to aid in them falling asleep at the designated nap time. Shepard reported to Faulk that this parent provided the melatonin to the daycare and gave specifics on the amount and time it was to be given to their child. According to Shepard, Faulk stated, Voris was pleased with the effects of the melatonin and began administering the melatonin to a large number of other children without parental consent.

Faulk then stated that Shepard admitted to him that she was also administering the melatonin to children under the orders of Voris but stopped because she felt it was not right to do so without consent. Faulk stated he was notified by Shepard of what was happening on January 29, 2023 and has since terminated Director Voris and notified Church Legal.

Officer Mercuri informed Detective Sergeant M. Waggoner (31488) of CMPD of the incident for further investigation. Officer Mercuri notified DCS of the initial information, ref. DCS case# 2764738.

On February 2, 2023, Det. Sgt. Waggoner met with Pastor Faulk at the New Life Church location, in the Pastor's Office. Pastor Faulk stated that he had discovered, from talking with Shepard, that seventeen children were given melatonin gummies without parental consent from mid-December 2022 to the end of January 2023 by Director Voris and Assistant Director Shepard on more than one occasion. Pastor Faulk provided a list of the children, their ages, and the parents information to Det. Sgt. Waggoner. Pastor Faulk advised Det. Sgt. Waggoner that the daycare providers at Kidz Life Childcare Ministry would administer medications, such as Tylenol or Motrin, or other prescription medications to children under the direct consent and instructions from a parent or guardian. Pastor Faulk stated the consents were normally verbal and not in written form.

Pastor Faulk then advised Det. Sgt. Waggoner that after he was informed by Shepard of the dispensing of melatonin without parental consent, he contacted Church Legal and met with Director Voris on Monday, January 30, 2023 at 6:30p at the New Life Church location to discuss what had been occurring. Pastor Faulk stated that Director Voris and her husband arrived at the location and Pastor Faulk asked her about giving melatonin to the children at the daycare. Pastor Faulk stated that Director Voris advised him she had permission from two sets of parents to dispense melatonin gummies to two different children daily to assist them in sleeping during naptime. Director Voris stated that one of the parents had the melatonin gummies delivered to the Church for the staff to use.

Pastor Faulk then asked Director Voris if she had been giving other children the melatonin gummies without parental consent and she stated that she had been doing so. Pastor Faulk advised Director Voris that was wrong. Pastor Faulk then advised Det. Sgt. Waggoner that Director Voris' husband then became verbally loud and defensive asking Pastor Faulk what was the outcome of the meeting. Pastor Faulk advised Director Voris she was terminated from her position and to gather any personal

belongings from the church before exiting. Pastor Faulk continued to say that Voris' husband was intimidating and stating Voris had done nothing wrong. Pastor Faulk then advised that Voris was in his office gathering some personal items when he noticed she took her Church Personnel File from his filing cabinet and attempted to place it into her purse. Pastor Faulk told Voris to give him the file back and that she did not have permission to take that. Pastor Faulk advised that Voris became disgruntled and Voris and her husband were asked to leave church property. Pastor Faulk stated he has no more contact with Voris since.

Pastor Faulk also advised Det. Sgt. Waggoner that Voris had already placed a notice to resign in before he learned about the melatonin dispensing, as she and her husband are planning to move to Florida in mid-February.

Pastor Faulk then stated to Det. Sgt. Waggoner that Assistant Director Shepard was still employed with the daycare and was currently at the location working.

On February 2, 2023, at 9:30am, Det. Sgt. Waggoner met with Assistant Director Shepard in Pastor Faulk's Office at the New Life Church location in private. Det. Sgt. Waggoner, recording the conversation via voice recorder, then conducted an interview with Shepard. Shepard stated that in mid-December 2022, a parent of one of the daycare children, KR (3yo), stated her child has anxiety issues and has a difficult time napping at the daycare center. The parent then provided Melatonin Gummies to Director Voris to aid the child in sleeping during naptime. Shepard stated she knew about the parental consent for KR and that Director Voris was dispensing that melatonin daily to KR. Shepard then stated that another parent knew Director Voris was giving melatonin to KR for trouble napping and gave verbal consent to Director Voris to administer Melatonin Gummies to their child, EB (3yo), as well. Shepard stated that these two children received Melatonin Gummies everyday they were at the daycare center.

Shepard then stated that all children in the daycare, ages 1 to 4, all take nap time at the same time and in the main sanctuary of the church daily. Nap time is approximately two hours each day. Shepard stated the children lay on cots while Director Voris and Shepard sit in the room and monitor their sleeping. Shepard stated that other staff members are taking their lunch breaks, cleaning the lunch dishes, and cleaning the rest of the rooms while the children nap. Shepard stated that she will also take a quick lunch daily while Director Voris would sit with the children alone and visa versa, letting Director Voris take a break while Shepard sat with the napping children alone. When asked what happens if a child will not nap or gets up early by Det. Sgt. Waggoner, Shepard stated normally the child is taken into a separate room to play so as not to disturb the other still sleeping children. Shepard also advised that nap time was a "break time" for the staff to read a book, look on their phones, and generally "relax" from watching the children.

Shepard then stated that children, ages 1 to 4, were given the Melatonin Gummies by Director Voris and herself. Shepard stated she did give Melatonin

Gummies under the orders of Director Voris to children without parental consent on more than one occasion but stopped and told Pastor Faulk because she believed it to be wrong. Shepard was visibly nervous and upset while speaking with Det. Sgt. Waggoner, showing remorse for her actions. Shepard then provided a list of the children, split up into age groups, that she knew of who had received Melatonin Gummies without parental consent and the dosage they would receive. The list included 17 children, ages 1 to 4, who received either 1/3 of a split-up Melatonin Gummy, a 1/2, or a whole gummy. Shepard stated it would not be every day, but only when the children seemed to have difficulty sleeping. Shepard stated these were the children she knew of but was unsure if Director Voris was dispensing the Melatonin Gummies to other children without her knowledge. Shepard stated she observed Director Voris dispense the Melatonin Gummies to these children on multiple occasions and knew she did not have parental consent. Shepard also stated that on more than one occasion, Director Voris would tell her to give a certain child a Melatonin Gummy and Shepard stated she would intentionally not give that child a Melatonin Gummy and would advise Director Voris she forgot as to avoid dispensing the gummies to children without parental consent. At no time did Shepard inform any parents about their child receiving the Melatonin Gummies.

Shepard went on to say that Director Voris was a "bully" to the staff and was very controlling and rude. Shepard stated that the staff felt intimidated by Voris and that if they did not do as she wanted, they would be wrongfully disciplined or terminated from employment.

Shepard stated the Melatonin Gummies were kept in Pastor Faulk's office, however, the bottle was now in her vehicle.

Shepard stated that Leslie Hollis, another daycare provider at the Kidz Life Childcare Ministry, may have also witnessed the Melatonin Gummy dispensing. Shepard also stated she has been employed at the Kidz Life Childcare Ministry since September of 2022.

Det. Sgt. Waggoner collected the Melatonin Gummies from Shepard, who retrieved them from her vehicle, as evidence.

On February 2, 2023, Det. Sgt. Waggoner then met with Leslie Hollis in Pastor Faulk's Office at the New Life Church location in private. Det. Sgt. Waggoner, recording the conversation via voice recorder, then conducted an interview with Hollis. Hollis stated she has been employed with Kidz Life Childcare Ministry for two years and that Tonya Voris was the Director who hired her. Hollis described Voris as a difficult boss who managed as "her way or the highway" style.

Hollis stated she learned that Director Voris had permission to give Melatonin Gummies to one of the children in the daycare for trouble napping. Hollis then stated she began observing Director Voris give more children the Melatonin Gummies on several occasions and did not believe she had parental consent to dispense that. Hollis

stated she believed Director Voris thought the Melatonin Gummies worked well and began giving it to other children. Hollis then stated that she watched the 2-year-olds and had, on more the one occasion, witnessed Director Voris dispense the Melatonin Gummies to children without parental consent.

On February 2, 2023, Det. Sgt. Waggoner spoke with Tonya Voris via recorded telephone conversation. Det. Sgt. Waggoner identified himself as a police officer and advised Voris he was investigating the Melatonin Gummies dispensing at the Kidz Life Childcare Ministries. Voris immediately advised Det. Sgt. Waggoner she had no comment at that time. Det. Sgt. Waggoner asked Voris if she would come to the police station for an interview and she agreed to come in and speak on February 3, 2023, at 9:00a.

On February 2, 2023, Det. Sgt. Waggoner inspected the bottle of Melatonin Gummies supplied by Shepard. Det. Sgt. Waggoner observed them to be brand VICKS PUREZzzs KIDZ Melatonin + Chamomile and Lavender for ages 4+ in a purple bottle with purple gummies. On the label the word "K████" was written in blue marker. The warning section of the label states "do not use if you are allergic to Chamomile or plant in the Aster family, or other ingredients contained in this product. Consult a healthcare professional: if you are experiencing long-term sleep difficulties, if taking medications... KEEP OUT OF REACH OF CHILDREN." Also on the bottle, under the instructions portion, the label reads; "Directions: for your child, start with one and chew up to two gummies as needed 30 minutes before bedtime. For best results, allow more than 6 hours of sleep." Det. Sgt. Waggoner placed the bottle, which was over halfway empty, into the Cumberland Police Property Room as evidence.

On February 2, 2023, at 3:00pm, Det. Sgt. Waggoner received a call from Tonya Voris who stated that she was canceling her appointment to come and speak with Det. Sgt. Waggoner after being advised by an attorney to not give a statement. Voris refused to give the attorney's information to Det. Sgt. Waggoner and ended the phone call.

On February 3, 2023, Det. Sgt. Waggoner spoke with Ashley Pugh, mother of 3-year-old KP and 1-year-old KP2, who were identified by Shepard as two children being given melatonin gummies by Director Voris. Pugh stated to Det. Sgt. Waggoner that she, nor her husband Shane, gave permission to Director Voris, verbally or written, or any other staff at Kidz Life Childcare Ministries to dispense melatonin to KP or KP2 at any time. Pugh stated that during the time frame Director Voris was dispensing melatonin, she observed KP waking up constantly at night when previously, KP had slept through the night since before being 1-years-old. Pugh stated that since Voris has been removed, KP has begun sleeping normally as before. Pugh also reported to Det. Sgt. Waggoner that KP advised her "bubby got a gummy before nap time" on one occasion, meaning KP2 had received a melatonin before nap. Pugh stated she believed the gummy to be a fruit snack and did not think that Voris would be dispensing melatonin without permission.

On February 3, 2023, Det. Sgt. Waggoner spoke with Abigail Hampton, mother of 3-year-old RH and 1-year-old RH2, who were identified by Shepard as two children being given melatonin gummies by Director Voris. Hampton stated to Det. Sgt. Waggoner that she, nor her husband Scott, gave permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to RH or RH2. Hampton stated that during the time frame Director Voris was dispensing melatonin without their knowledge or consent, she had observed a suspicious skin rash on RH2, which can be a common side effect of melatonin use in children under 4 years of age. Hampton also stated that RH2 was abnormally more tired than normal and would be sleeping by 6:00pm every night and not waking until they would wake her around 7:00am. Hampton stated it concerned her so much she took RH2 to the doctor for evaluations. Once she was advised of the melatonin usage by Director Voris from Pastor Faulk, she again contacted RH2's doctor and informed him of the development. The doctor believes this could be what has effected RH2's sleeping habits. Since Voris' termination, Hampton stated that RH2 is acting and sleeping normally, and they have not had skin irritation issues.

On February 3, 2023, Det. Sgt. Waggoner spoke with Paul Caudill, father of 4-year-old MC, who was identified by Shepard as one of the children being given melatonin gummies by Director Voris. Caudill stated MC just turned 4-years-old on 2/1 and was 3-years-old at the time she was being given melatonin by Director Voris. Caudill informed Det. Sg. Waggoner that he, nor his wife Cari, gave permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to MC. Caudill went on to say that during this time frame, he and his wife noticed MC's behavior to be much more erratic and she would "act crazy" in the evenings, something that they had not ever seen before. Caudill also stated that MC would not eat dinner and would complain of headaches constantly. Since Voris' termination, Caudill stated that MC's behavior is back to normal, she has not complained about headaches, and is eating normally again. Caudill stated he believed the melatonin gummies were producing harmful side effects to MC and that Director Voris never mentioning this could have created more potential harm to his child.

On February 3, 2023, Det. Sgt. Waggoner spoke with Meagan McCurdy, mother of 2-year-old MM, who was identified by Shepard as one of the children being given melatonin gummies by Director Voris. McCurdy stated to Det. Sgt. Waggoner that she, nor her husband Luke, had given permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to MM. McCurdy stated that she did not notice any odd behavior from MM, but was upset that Director Voris would give any substance to her child without her knowledge or permission.

On February 3, 2023, Det. Sgt. Waggoner spoke with Heidi Grieshop, mother of 1-year-old JG, who was identified by Shepard as one of the children being given melatonin gummies by Director Voris. Grieshop stated to Det. Sgt. Waggoner that she, nor her husband Brad, had given permission to Director Voris, verbally or written, or any

other staff of Kidz Life Childcare Ministries to dispense melatonin gummies to JG. Grieshop stated she could not be sure if any side effects were seen due to the age of JG and the child being unable to verbally communicate. Grieshop was upset about the situation and was concerned about Voris continuing this behavior in the future.

On February 3, 2023, Det. Sgt. Waggoner spoke with Katie Bennett, mother of 2-year old CB and 4-year-old GB, who were identified by Shepard as two children being given melatonin gummies by Director Voris. Bennett stated to Det. Sgt. Waggoner that at no time did she, nor her husband Anthony, give permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to CB or GB. Bennett stated that she noticed CB to be more irritable and crankier in the evenings during this time frame, which was unusual beforehand. Since Voris' termination, Bennett stated that she has noticed CB acting normal as she did before this time frame. Bennett was very upset about the situation and believed Director Voris to be dishonest.

On February 3, 2023, Det. Sgt. Waggoner spoke with John Molloy, father of 4-year-old EM, who was identified by Shepard as one of the children being given melatonin gummies by Director Voris. Molloy stated to Det. Sgt. Waggoner that he, nor his wife Any, had given permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to EM. Molloy stated to Det. Sgt. Waggoner that EM was transitioned out of napping all together as they were preparing the child for entrance into a kindergarten school. Molloy stated that he asked Director Voris several times to not have EM nap and to have staff work on vocabulary with the child to prepare for entrance tests for the kindergarten school. Molloy stated that Director Voris would tell him that EM is tired and needed to nap, unknowing that Director Voris was administering melatonin gummies to EM without Molloy's knowledge or consent. Molloy stated he believed this harmed EM and as they had trouble getting her to fall asleep at night and focusing in the evenings.

On February 3, 2023, Det. Sgt. Waggoner spoke with Lisa Kilgore, mother of 4-year-old OK, who was identified by Shepard as one of the children being given melatonin gummies by Director Voris. Kilgore stated that she, nor her husband Jarred Knight, had given permission to Director Voris, verbally or written, or any other staff member at Kidz Life Childcare Ministries to administer melatonin gummies to OK. Kilgore went on to say that OK told her that her friends at lunch would get vitamins. Kilgore explained that OK takes gummy vitamins at night and did not know the gummies given by Voris were melatonin and given to make the children sleep during nap time. Kilgore stated OK does not receive melatonin at home.

On February 3, 2023, Det. Sgt. Waggoner spoke with Michael Crist, father of 4-year-old MC2, who was identified by Shepard as being given melatonin gummies by Director Voris. Crist stated that he, nor his wife Katie, had given permission to Director Voris, written or verbal, or any other staff member at Kidz Life Childcare Ministries to dispense melatonin gummies to MC2. Crist stated that he and his wife noticed MC2 acting strangely at home during this time period. Crist stated that his wife, Katie, asked

MC2 if the child had been given any treats at lunch time. Crist stated MC2 advised them "TT", which is the name most of the children at the daycare use for Tonya Voris, had given the child "gummy bears" to help them sleep. MC2 went on to tell Katie and Michael Crist that "TT" would "rip" the gummy bear and give them only part. Crist stated that MC told them the child would not get one everyday like another child and named that child to Crist. That child was identified to Det. Sgt. Waggoner as KR. Crist stated MC2 does not receive melatonin at home.

On February 3, 2023, Det. Sgt. Waggoner spoke with Kiley Burgess, mother of 3-year-old JB, who was identified by Shepard as one of the children receiving melatonin gummies from Director Voris. Burgess stated to Det. Sgt. Waggoner that she, nor her husband David, gave permission to Director Voris, verbally or written, or any other staff at Kidz Life Childcare Ministries to dispense melatonin gummies to JB. Burgess was upset while speaking with Det. Sgt. Waggoner and angry about the situation. Burgess stated that JB would have anxiety about going to the daycare center and expressed that he was afraid of Director Voris. Once Burgess found out from Pastor Faulk about the melatonin gummies, she asked JB about gummies at school. JB advised Burgess that "TT", Tonya Voris, would give purple gummy bears at lunch to several kids. Burgess stated she believed this happened on several occasions with JB and his behavior at the daycare and at home was uncharacteristic to before December 2022. Burgess advised Det. Sgt. Waggoner that once she told JB Voris would no longer be at the daycare, Burgess stated JB began to cry stating he was happy. Burgess again expressed how upset she was about the situation.

On February 3, 2023, Det. Sgt. Waggoner spoke with Kyle Ragan, father of 3-year-old KR, who was identified by Shepard as the first child with parental consent to administer melatonin gummies to. Ragan stated that he and his wife gave verbal permission to Director Voris to dispense melatonin gummies to their child, KR, before nap time due to KR being a "bad napper" and having behavioral issues at daycare. Ragan stated his wife, Sara, had a bottle of purple melatonin gummies sent to the church for Director Voris' use and asked she give KR a half a dose each day. Ragan also stated he and Sara give KR melatonin at nighttime to help KR fall and stay asleep.

On February 3, 2023, Det. Sgt. Waggoner spoke with Lindsey Buck, mother of 3-year-old EB, who was identified by Shepard as the second child with parental consent to administer melatonin gummies to. Buck stated that Director Voris contacted her stating EB was disruptive during nap time and suggested having Voris give EB some melatonin to help her nap better. Buck stated they gave verbal permission approximately two weeks ago to administer melatonin to EB for nap time. Buck stated she was disappointed to hear Director Voris was dispensing melatonin to other children without parental consent.

Det. Sgt. Waggoner attempted to contact three other parents, totaling four other children affected, for interview, however, was unable to get into contact with them.

Det. Sgt. Waggoner, upon speaking with the parents of the children affected by Voris' actions, observed that each parent was deeply upset by these actions and several noticed direct side effects from overuse of the Melatonin Gummies for the age of their child. Voris' dispensing of melatonin gummies to children without parental consent was reckless due to her being unaware of a potential allergy threat, dietary issues, and unknown side effects harming the children. Voris dispensed the Melatonin Gummies to forcefully induce sleep in several children for her personal gain in not having to deal with fussy or problematic children who would not sleep during 'naptime', which was characterized by several staff members as their "break-time". Furthermore, Voris' actions and behavior after being confronted and told her actions were wrong, appeared unremorseful to those who witnessed her.

Tonya Voris has no previous criminal history at this time.

3. That your affiant identified the person doing these acts by means of verbal identification and Indiana identification card as Tonya Rachelle Voris, who was 52 years of age.
4. That the events took place in the Town of Cumberland, Hancock County, State of Indiana

WHEREFORE, the affiant and the State of Indiana respectfully requests the Court find probable cause exists for the arrest of Tonya Rachelle Voris.

I affirm, under the penalties for perjury as specified in I.C. 35-44.1-2-1, that the foregoing representations are true.

Dated: 02/06/2023

/s/Mark A. Waggoner, Detective Sergeant
Cumberland Metropolitan Police Department
Affiant/Agency