STATE OF INDIANA MARION COUNTY, ss:		IN THE MARION SUPERIOR COURT CRIMINAL DIVISION
		Cause No: 49
STATE OF INDIANA	)	
	)	<u>INFORMATION</u>
vs.	)	COUNT I
V.5.	)	STALKING
	,	I.C. 35-45-10-5(a) and I.C. 35-45-10-5(b)(1)
MICHAEL THOMAS LEW	IS W/Male	A LEVEL 5 FELONY

On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on his/her oath (or having affirmed), says that in Marion County, Indiana

### **COUNT I**

DOB 1/5/1970

Between December 16, 2024, and January 11, 2025, MICHAEL THOMAS LEWIS did stalk another person, to-wit: Caitlin Clark, by engaging in a knowing or an intentional course of conduct involving repeated or continuing harassment of Caitlin Clark that would cause a reasonable person to feel terrorized, frightened, intimidated, or threatened, and that actually caused Caitlin Clark to feel terrorized, frightened, intimidated, or threatened, and did make an implicit or explicit threat with the intent to place Caitlin Clark in reasonable fear of sexual battery;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

January 11, 2025 Date

RYAN MEARS

Marion County Prosecutor 19th Judicial Circuit

/s/ Robert Beatson Robert Beatson, #31221-49 Deputy Prosecuting Attorney

**State's Witnesses:** 

D. Stonehouse/MCSO Caitlin Clark

STATE OF INDIANA	)	IN THE MARION SUPERIOR COURT
MARION COUNTY, SS	)	CRIMINAL DIVISION
STATE OF INDIANA	)	
	)	Cause No.: 49
vs.	)	
	)	
MICHAEL THOMAS LEWIS	)	
Defendant	)	
RACE W SEX M	)	
DOB: 1/5/1970	)	

## MOTION FOR STAY AWAY ORDER UPON RELEASE ON BOND OR PERSONAL RECOGNIZANCE

Comes now the State of Indiana, by the undersigned Deputy Prosecuting Attorney, and hereby moves the Court to issue a STAY AWAY ORDER as a specific condition of the Defendant's pre-trial release in this cause. In support of this motion, the State alleges that:

1. The State has filed a criminal charge, or charges, in this cause.

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- 2. There is a relevant nexus between the criminal charge(s) and the geographic area which encompasses the desired stay away order.
- 3. A Stay Away Order is necessary to ensure peace in the community until this cause is disposed of.
- 4. The Defendant has been arrested or charged with the commission of the crime(s) of Count 1: Stalking, a Level 5 Felony.
- 5. The State requests the Defendant stay away from: Gainbridge Fieldhouse and Hinkle Fieldhouse

WHEREFORE, the State of Indiana respectfully requests that the Court issue the included STAY AWAY ORDER as a specific condition of the Defendant's pre-trial release.

/s/ Robert Beatson			
Robert Beatson			
Deputy Prosecuting Attorney			

STATE OF INDIANA	) ) SS:	IN THE MARION SUPERIOR COURT CRIMINAL DIVISION
COUNTY OF MARION	)	
STATE OF INDIANA	)	
	)	
<b>v.</b>	)	
	)	
MICHAEL THOMAS LEWIS	5 )	CAUSE NO. 49

## MOTION FOR GREATER THAN STANDARD BOND

Comes now the State of Indiana, by its Deputy Prosecuting Attorney, and requests that the Court set bond in this matter in an amount which is greater than the standard bond. The State hereby notifies the Court of its objection to the Defendant's release on his own recognizance. In support of this objection, the State would show the Court as follows:

- 1. The defendant poses a RISK TO THE PHYSICAL SAFETY OF ANOTHER PERSON OR THE COMMUNITY:
  - a. Defendant is charged with sending a series of sexually violent messages to a public figure.
  - b. Defendant traveled from his home in Texas to Indianapolis with the intent to be in close proximity to the victim.
  - c. Defendant continued to message the victim after being questioned about his behavior by law enforcement.
  - d. Defendant's messages to the victim after Defendant's contact with law enforcement demonstrate a complete disregard for the seriousness of his conduct and a likelihood that he will attempt to continue his pattern of harassment.

Respectfully submitted,

/s/ Robert Beatson

Robert Beatson
Deputy Prosecuting Attorney
Marion County Prosecutor's Office
251 E. Ohio St., Suite 160
Indianapolis IN 46204
317-327-3522

# AFFIDAVIT FOR PROBABLE CAUSE

### STATE OF INDIANA, COUNTY OF MARION, SS:

Lieutenant Darren Stonehouse of the Marion County Sheriff's Office swears (affirms) that:

On 01/10/2025, Lt. Stonehouse with the Marion County Sheriff's Office, Grand Jury Division, was made aware of a possible pattern of stalking by Michael Thomas Lewis (W/M DOB 01/05/1970) against Caitlin Clark. Lt. Stonehouse learned that Michael Lewis sent multiple threating and sexually explicit messages through his "X" account – "Michael Lewis@RacerX2031" – to Caitlin Clark's "X" account – @CaitlinClark22.

Listed below are some of the posts made by Michael Lewis from 12/16/2024 through 01/02/2024.

- @CaitlinClark22 After the Clap game, I would have laid the wood all night all next day and the day after..then you would need the gyno from all the wear and tear..where u would be told, im sorry miss clark but u have a serious case of the "clap"
- @CaitlinClark22 i already have one foot on a banana peel and the other on a stalking charge..so I wont be able to wear ur hoodie..wont look good in court
- @CaitlinClark22 been driving around your house 3x a day..but don't call the law just yet, the puble is allowed to drive by gainbridge..aka Caitlin's Fieldhouse
- @CaitlinClark22 nobody can make you come for 30 straight minutes...nobody
- @CaitlinClark22 can I get some tongue action
- @CaitlinClark22 lick my....(it rhymes w lick)
- @CaitlinClark22 im getting tickets. Im sitting behind the bench..and im gonna f em up...watch me....settle down Michael..ur stuck in snow
- @CaitlinClark22 we are coming to u live from downtown indy and we have a special guest named Michael on vacation from Texas
- @CaitlinClark22 uwannadikpik
- @CaitlinClark22 id much rather put my hands on myself shoot the moon, while calling out ur name
- @CaitlinClark22 send me sumnudezofyou..im restless
- @CaitlinClark22 they said I was sending threatening texts..but the only though on my mind was....CAITLIIIIIIIIIIIIINNNNN
- @CaitlinClark22 pacers rented ur house last nite..hope they cleaned up after themselves....FBI paid me a visit
- @CaitlinClark22 last college football game I watched became the greatest college football game of all time....NAME THE GAME AND I WILL WORK UR PUSSY

#### **Affidavit for Probable Cause**

From: Sgt. Darren Stonehouse

DATED: January 11, 2025

@CaitlinClark22 got banned from caitbridge. Im sorry. Bu maybe I go to ur road games..its ok right?

Due to the nature of these messages, the FBI sent an Emergency Disclosure request to "X" requesting account information regarding Michael Lewis's "X" account. It was subsequently confirmed that the "X" account belonged to Michael Lewis and the recent messages he sent came from an IP address at the Hilton Garden Hotel, located at 120 West Market Street, Indianapolis, Indiana, and another IP address belonging to the downtown Indianapolis Public Library. Lewis's presence in Indianapolis was especially concerning given that he is a Texas resident.

On 01/08/2025, IMPD officers with body worn cameras went to Michael Lewis's hotel room on a welfare check. After knocking on the door, Lewis willingly came out and talked to the IMPD Officers. Lewis confirmed that he was not a resident of Indiana and that he was from Texas and claimed to be in Indianapolis on vacation. When asked why he was making so many posts about Caitlin Clark, Lewis said, "just the same reason everybody makes posts." When asked about posts that were threating in nature, Lewis said it wasn't him. Lewis claimed that this is just an imaginary relationship.

Lewis was asked to not post things like he has been posting, and to double check what he sends out because his posts can be perceived as threatening. Lewis said, it's an imagination, fantasy type thing and it's a joke, and it's nothing to do with threatening. After their conversation, the officers left and Lewis went back into his hotel room.

On 01/11/2025, Lt Stonehouse interviewed Caitlin Clark. Clark stated that she has been very fearful since learning of the messages and that she has altered her public appearances and patterns of movement due to fear for her safety. Clark stated that she has become very concerned for her safety after learning that Lewis was in Indianapolis. Clark also stated that she doesn't know Lewis and has never responded to any of his messages or posts.

Lt. Stonehouse has confirmed that Michael Lewis has continued to post on "X" towards @CaitlinClark22 as recent as 01/11/2025, after being contacted by IMPD.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

/s/ Lt. Darren Stonehouse

AFFIANT