

**Brady/Giglio Status Review**  
**Overview of Personal History Statement**  
**Of**  
**Steven Chase Lyday**

**OVERVIEW**

- The following questions and answers are excerpts from the Avon Police Department Personal History Statement (PHS) questionnaire related to the background investigations of Steven Chase Lyday. Mr. Lyday was an applicant at the time for the Avon Community School Corporation Police Department (ACSCPD) Chief of Police position. The start date of the PHS was 01/17/2020, and the interview took place at the Avon Police Department located at 6550 E. US Highway 36, Avon, IN 46123.
  - following questions and responses from Mr. Lyday are currently being reviewed as new information has been discovered that **impeaches** some of his answers and responses provided by Mr. Lyday. Each question will be presented how it is presented and read in the PHS to the applicant. I will provide the question, Mr. Lyday's original response/answer, and then newly acquired information that will contradict his original answers.
  - The following supporting documentation is also included for reference purposes; the full complete file of Mr. Lyday's Personal History Statement and background information, an official records request to the Marion County Sheriff's Office Human Resources division for disciplinary records, and the disciplinary records themselves from Steven Chase Lyday's MCSO disciplinary file.
  - This information is being provided to the Hendricks County Prosecutor Loren Delp for his review, and consideration of Brady/Giglio status of Steven Chase Lyday.

**FALSELY ANSWERED PHS QUESTIONS BY STEVEN CHASE LYDAY**

- **#50 Have you ever had any extended absences for any reason from employment or school for any reason other than approved vacation? No**
  - Mr. Lyday Responded "No" to this question when he clearly had at least one documented extended absence due to a 30-day suspension that he received from Sheriff John Layton in November of 2015. Mr. Lyday had an additional sanctioned suspension for 10 days, but it is unclear at this time as to whether or not Mr. Lyday actually served the suspension before his resignation from the sheriff's office.
- **#60 What places where you once worked would refuse to rehire you? None**
  - Mr. Lyday responded "None", however recent discovered information revealed that Mr. Lyday did not provide truthful information about who his supervisor was at Marion County Sheriff's Office. Mr. Lyday appears to have listed a friend from the MCSO, aiding him further in hiding the four written disciplinary action in his personnel file. Due to Mr. Lyday's serious disciplinary file and resignation, it is probable that MCSO would not rehire him.

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- **#64 Have you ever lied concerning your actions as an employee? No**
- Mr. Lyday responded “No” to this question; however, Mr. Lyday received a written reprimand & orders to comply while employed with the MCSO on March 20<sup>th</sup>, 2018. The internal investigation found that Mr. Lyday was misleading, untruthful and had questionable integrity issues surrounding his performance of duties. The specific policy violations cited were; **212.10 Insubordination**, no officer shall be unwilling to submit to the proper authority of a ranking officer or be unwilling to follow the intent of Department policies and procedures by circumventing or ignoring them. The second policy violation cited was **223.10 Truthfulness**, officers shall not make false or incomplete statements to other employees or ranking officers when questioned or interviewed or when submitting reports. Mr. Lyday was found to have been deceptive for several months about monitoring and reporting on registered sex offenders. Please see the attached written reprimand for more details. It should be noted that Mr. Lyday signed each of his written reprimands, and did not contest the results of the internal investigation(s).
- **#66 Have you ever been interviewed by an employer’s internal affairs, quality control, loss prevention or other disciplinary investigation unit? Yes, while working for MCSO 2016 interviewed for verbal dispute with another officer/both officers were disciplined**
- Mr. Lyday only provided information about an interview for a “verbal dispute”, but documentation provided by the MCSO Human Resources division clearly proves that he omitted at least three other occasions where he was interviewed and/or disciplined for policy violations including untruthfulness, misleading and insubordination.
- **#67 Have you ever been the subject of a disciplinary investigation at work, at a volunteer, or other unpaid position, in the military or in school? Yes, see question 66**
- Mr. Lyday once again only responded to the one “verbal dispute”, and clearly omitted all the other disciplinary investigations and reprimands that he was aware existed in his MCSO disciplinary file.
- **#68 Have you ever been suspended from employment or school for any reason? Yes, see question 66**
- Once again, Mr. Lyday only referred to one incident. The documents provided by MCSO Human Resources clearly indicate that he was sanctioned with another suspension. Whether or not he served the suspension before resigning is uncertain, however the fact remains that he was sanctioned as such and failed to disclose it during this interview.
- **#99 Have any judgments(s) ever been filed against you? Yes, student loans now current**

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- Mr. Lyday only provided information regarding a financial judgement related to student loans. Public records indicate that there are other judgments and small claims entries involving Mr. Lyday
- **#102 Have you ever had any delinquent federal or state income tax? Federal 2015 and is current due to a 1099 issue**
  - Mr. Lyday referred to a federal tax issue related to a 1099 issue. There are public records that indicate that he had other tax issues that he did not disclose at the time of this interview.
- **#297 Have you ever falsified a document of any kind in your life? No**
  - Mr. Lyday responded "No" to this question, however he was reprimanded for this exact behavior by the MCSO. Please refer to the attached written reprimands for more details.
- **#299 Have you ever provided a false, misleading, or incomplete statement to a law enforcement officer, sheriff deputy, correctional officer, probation officer, parole officer, or judge of any kind in your life? No**
  - Mr. Lyday responded "No" to this question, however internal affairs documents from the MCSO Human Resources division indicates that this was a false statement by Mr. Lyday. Mr. Lyday was disciplined and reprimanded by his superiors for this exact violation. Not only did Mr. Lyday not provide this information to me, but he provided someone other than his supervisor to me for his employer supervisor contact. It appears as though he provided the name and contact information to a friend/co-worker from MCSO for me to contact instead of his actual supervisor. I have probable cause to believe that Mr. Lyday did this knowingly and intentionally to mask his true disciplinary record, and prevent me and the Avon Community School Corporation from discovering his true personnel disciplinary record.
- **#300 Have you ever intentionally violated a court order issued by a judge or magistrate? No**
  - Mr. Lyday responded "No" to this question. In 2018 Mr. Lyday was employed by the MCSO, and assigned the duties of monitoring and documenting Marion County Sex & Violent Offender Registry as ordered by the Marion County Court system and his agency. For several months Mr. Lyday failed to fulfill these duties and directives of the court and his agency. MCSO Lieutenant Douglas Smith discovered Mr. Lyday's dereliction of duties, and began investigating the matter. Lt. Smith concluded that Mr. Lyday failed to perform his duties properly, was untruthful when questioned about this situation during an official internal investigation, and disregarded other departmental directives.

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- **#306 Have all of your answers provided during this interview been truthful, exhaustive, and forthcoming? Yes**
  - Mr. Lyday responded “No” to this question. This question as well as the others documented in this material are not ambiguous whatsoever. It is not believable that Mr. Lyday simply *forgot* that he had 4 written disciplinary actions in his personnel file with the MCSO. Mr. Lyday did not *forget* who his supervisor was at the MCSO, he intentionally provided the contact information of a friend and co-worker at the MCSO under the guise as his supervisor to subvert the discovery of his negative disciplinary file. Mr. Lyday **knowingly and intentionally** answered these questions deceptively to prevent the discovery of negative disciplinary documents and information by me and the Avon Community School Corporation.
  
- **Section A-3 of PHS- this section of questions of the Personal History Statement is focused on applicants with prior law enforcement experience and employment.**
  
- **#1 As an officer, have you ever made a false statement? No**
  - Mr. Lyday responded “No” to this question; however, the human resource’s documents confirm that he had in fact been misleading and untruthful during his employment with the Marion County Sheriff’s Office, in the official capacity as a law enforcement officer, and was untruthful and misleading during an official proceeding (internal affairs investigation) being conducted by authorized agents of his law enforcement agency.
  
- **#13 As it pertains to your actions as an officer, have you ever provided false information while testifying in any legal proceeding or during an internal investigation? No**
  - Mr. Lyday responded “No” to this question, however the reprimand that he received on March 20<sup>th</sup> 2018 by Lt. Douglas Smith of the MCSO documented that Mr. Lyday had provided misleading information, was untruthful, and exhibited behavior with integrity issues before and during the internal investigation. Mr. Lyday signed acknowledgment of receipt of this reprimand, and did not contest the findings. It is unclear at this time if Mr. Lyday actually served the suspension before resigning from the Marion County Sheriff’s Office.

The discovery of Mr. Lyday’s disciplinary files raises disturbing concerns about his honesty, integrity and moral character as a law enforcement officer. I am requesting that the Hendricks County Prosecutor Loren Delp evaluate all of this information and material, and determine whether or not Mr. Lyday’s actions rise to the level of Brady/Giglio status. Thank you for your consideration.

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