

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF HENDRICKS, SS:

Detective Matt Beaver

swears (affirms) that:

On June 24, 2023, I, Detective Matt Beaver, was assigned a case of Forgery/Official Misconduct reference a Plainfield Police Department Officer. The initial report was taken by Lieutenant Jeff Hearon of the Indiana State Police (ISP).

On June 12, 2023, Lt. Hearon was contacted by Plainfield Police Deputy Chief Joe Aldridge, at approximately 1300 hours. Deputy Chief Aldridge informed Lt. Hearon of potential official misconduct by Plainfield Police Department Officer, Valentin Khazin. Aldridge claimed Khazin was believed to have orchestrated a false crime report and claims of harassment. Deputy Chief Aldridge requested the Indiana State Police conduct an investigation. Deputy Chief Aldridge provided Lt. Hearon with a copy of an internal Plainfield Police Department memo summarizing the investigation, including the interview of Paul Luecke conducted by the Plainfield Police Department. Lt. Hearon agreed to take the investigation and set up an interview with Paul Luecke on June 18, 2023.

The Plainfield Police Department received a report from a local gas station clerk, Paul Luecke, stating Officer Khazin attempted to use his position as a police officer to influence Mr. Luecke is assisting him with making false accusations against another police officer. The specific target of the false accusations was Sgt. Nathan Nolin of the Plainfield Police Department.

On June 18, 2023, at approximately 1230 hours, Lt. Hearon met with Paul Luecke at the Danville Police Department to conduct an interview. Mr. Luecke started the interview by explaining to Lt. Hearon he is a clerk at the Speedway Gas Station located at 610 West Main Street, Plainfield. Mr. Luecke was usually scheduled to work Sunday nights from 2 PM – 10PM, and then works Monday through Thursday nights from 10 PM – 6 AM. Mr. Luecke often has Plainfield Police Officers come to the station to get coffee and take a break. Luecke stated one officer, Valentin Khazin, stops in frequently; the two of them have developed a friendship over some time.

On Tuesday June 6, 2023, at 10PM Mr. Luecke worked his night shift. Officer Khazin came in and had a lengthy conversation with him. This conversation started in the late hours of June 6, 2023, and went into the early morning hours of June 7, 2023. Mr. Luecke reported Officer Khazin walked into the gas station in full uniform while he was on duty. Officer Khazin then asked Mr. Luecke for a favor. Officer Khazin wanted Mr. Luecke to assist him by making false accusations against a fellow Plainfield Police Officer. As mentioned above, the target of the accusations was Sgt. Nathan Nolin. Sgt. Nolin is currently assigned to the School Resource Officer Section (SRO) of the department. Officer Khazin told Mr. Luecke he could “trust Paul to do this” based on the relationship they had developed. Officer Khazin explained if Mr. Luecke completed this, Mr. Luecke would benefit in the future with an unspecified, eventual quid pro quo.

Mr. Luecke explained in further details the steps Officer Khazin asked him to complete. Officer Khazin asked Mr. Luecke to compose three letters using an internet-based AI program called “Google Bard” or a similar program. The composed letters would make specific allegations against Sgt. Nolin regarding verbal, physical, and sexual abuse against children in the Plainfield Community School system. These children Sgt. Nolin would have direct access due to his role as an SRO. Officer Khazin suggested the AI program was a simple way to make each of the three letters; it would have minimal user input, and be supplied by an anonymous complainant which sounded unique. Khazin stated there would need to be three separate letters sent to three separate entities. They were to be sent to Plainfield Police Department Chief Kyle Prewitt, Plainfield Town Council, and The Plainfield Community School Board. Officer Khazin reported his motivation to Mr. Luecke was to “tarnish” Sgt. Nolin’s character. This would in turn reduce the chances of Sgt. Nolin getting promoted to Lieutenant, a position Khazin was attempting to obtain. Officer Khazin also stated the allegation was retaliation for an incident that occurred between the two approximately a year and a half ago. Officer Khazin and Mr. Luecke then discussed Mr. Luecke locating an apartment complex that did not have surveillance cameras to send the letters from.