

ALLEN CIRCUIT COURT

Indictment No. 15-CR-00129  
(Direct Presentment in reference to District Court No. 15-F-00156)

COMMONWEALTH OF KENTUCKY

PLAINTIFF

vs.

INDICTMENT

Timothy W. Madden  
(DOB: 2/24/1977)

DEFENDANT

COUNT ONE:

Kidnapping  
KRS 509.040  
(UOR 10072)  
Capital Offense

COUNT TWO:

Rape, First Degree - Victim less than 12 years of age  
KRS 510.040  
(UOR 10996)  
Class A Felony

COUNT THREE:

Sodomy, First Degree - Victim less than 12 years of age  
KRS 510.070  
(UOR 11186)  
Class A Felony

COUNT FOUR:

Murder  
KRS 507.020  
(UOR 09150)  
Capital Offense

THE GRAND JURY CHARGES that on or about November 14, 2015, in Allen County Kentucky, the above-named defendant committed the following offenses, to-wit:

COUNT ONE: The offense of Kidnapping when he unlawfully restrains Gabriella Doolin to accomplish or advance the commission of a felony or to inflict bodily injury to Gabriella Doolin, (a child under the age of 12) (victim was not released alive);

COUNT TWO: The offense of Rape, First Degree - Victim less than 12 years of age, when he engages in sexual intercourse by forcible compulsion with Gabriella Doolin and/or who was incapable of consent because she was less than twelve (12) years old, (victim received a serious physical injury as a result);

COUNT THREE: The offense of Sodomy, First Degree - Victim less than 12 years of age, when he engages in deviate sexual intercourse by forcible compulsion

with Gabriella Doolin and/or who was incapable of consent because she was less than twelve (12) years old, (victim received a serious physical injury as a result);

COUNT FOUR: The offense of Murder when with intent to cause the death of another person, he causes the death of Gabriella Doolin, (a child under the age of 12);

against the peace and dignity of the Commonwealth of Kentucky.

DEFENDANT'S PRESENT  
BAIL STATUS:

\$1,000,000 Cash

Upon the foregoing indictment  
the defendant's bail is hereby  
fixed as follows:

No Bail

The Clerk shall forthwith  
issue:

arrest warrant ✓  
criminal summons           

[Signature]  
Judge

WITNESSES:  
Det. Wesley Medley

INDICTMENT/MADDENTimothyDP (15F156)

TRUE BILL

[Signature]  
FOREMAN

Presented by the Foreman in  
the presence of the Grand  
Jury to the Court, and filed  
in open Court on this  
December 11, 2015.

[Signature]  
by: [Signature]  
Clerk, Allen Circuit Court