

[CAPTION]

MOTION TO JOIN RELATED OFFENSES

The Defendant, by counsel, respectfully requests this Court, pursuant to I.C. 35-34-1-10, to join the related offenses. In support of the Motion, the Defendant states the following:

1. The State has filed multiple Informations against the Defendant; [insert cause numbers and charges].

2. Both sets of charges are [CHOOSE ONE OR BOTH: based on the same conduct or on a series of acts connected together or constituting parts of a single scheme or plan. AND/OR Regardless if both charges are not part of a single scheme, there are of the same or similar character].

3. The ends of justice would best be served by consolidating the two trials into one trial.

WHEREFORE, the Defendant, by counsel, respectfully requests this Court to grant the Motion to Join Related Offenses, join the specified related offenses, and for all relief just and proper in the premises.

(Signature)


REFERENCES

CASEBANK D.6.b

I.C. 35-34-1-10 (motions; joinder of offenses; dismissal of offense joinable for trial or of related offenses; requisites; orders)

I.C. 35-34-1-9 (joinder of offenses or defendants)

CASE LAW

Allen v. State, [956 N.E.2d 195](#)  (Ind.Ct.App. 2011) (Defendant does not waive challenge under successive prosecution statute (IC 35-41-4-4) by failing to request joinder before pleading guilty in the first matter. Express language of IC 35-34-1-10(c) contemplates that dismissal of a subsequent matter is still available after resolution of first matter so long as Defendant requests the dismissal before the beginning of the second trial).