

**People v. Xandria Harris, 21-cf-86**

**Probable Cause Proffer 01/03/22 (as read in court by State's Attorney Jim Rowe)**

On December 29, 2021, Bradley Police Sergeant Marlene Rittmanic and Bradley Police Officer Tyler Bailey responded to the Comfort Inn Hotel in Bradley, Illinois to address a complaint regarding barking dogs that were left in a guest's vehicle. Officer Bailey arrived on scene at approximately 9:56pm that evening. Upon his arrival he runs the license plates of the suspect vehicle and it returns to the Defendant, Xandria Harris. Bailey enters the hotel lobby where he meets with Sgt. Rittmanic. Bailey asks a clerk at the hotel whether there are any rooms under the name of Xandria Harris or Darius Sullivan. Bailey has knowledge of Xandria Harris, knows her to frequently be in the presence of Darius Sullivan, and has knowledge that Darius Sullivan is wanted on outstanding warrants of arrest for failure to appear in court. Bailey also has knowledge at this time that Sullivan had previously fled from Bradley police officers who attempted to apprehend him on the warrants. The hotel clerk informs Ofc. Bailey and Sgt. Rittmanic that room 308 has the name of Darius Sullivan attached to the room.

Sgt. Rittmanic and Ofc. Bailey proceed up the stairs of the hotel to the third floor and proceed to room 308. The Officers' stated intention at the time was to issue this Defendant a local ordinance violation for the dogs being left in the vehicle, and to take Darius Sullivan into custody on the warrants.

At 10:13pm, Officers first knock on the door of room 308. There is no response.

At 10:14pm, Officers knock a second time. Officer Bailey loudly announces their presence "It's the police department" and explain that they need her to exit the room to address the complaint regarding the dogs. A female voice who we have come to learn was this Defendant responds "yes" and indicates she will be coming out of the room

At 10:17pm, Officer Bailey knocks a third time. He asks "Are you coming ma'am?" A female voice, again this Defendant, responds "yes I have to get dressed". Officer Bailey insists that she exit the room to address the complaint; the Defendant states she will be right there.

At 10:23pm, Officer Bailey knocks a fourth time. Defendant responds "Ok, I'm coming." Ofc. Bailey inquires as to who else in the room with the Defendant – she replies: "me, my sister and kids."

At 10:25pm, Officer Bailey knocks a fifth time. The Defendant responds "OK, I'm coming".

At 10:27pm, after Officers have waited 14 minutes and knocks at the door five times, the Defendant opens the door. The Defendant attempts to squeeze past the door and close it to prevent Officers from taking Darius Sullivan – who was present in the room – into custody. Both Officer Bailey and Sgt. Rittmanic ask the Defendant over and over again

to STOP blocking them in the doorway and to stop struggling with the door, Sullivan comes from around the corner in the hotel room holding a 9mm equipped with a drum clip. As the Defendant continues to prevent Officer Bailey and Sgt. Rittmanic from performing their duties as peace officers, Sullivan points the firearm at Officer Bailey and shoots Officer Bailey in the head. Sullivan then fires a first shot at Sgt. Rittmanic as she attempts to exit the kill zone. Sullivan chases Sgt. Rittmanic down the hallway of the hotel and pins her up against a door. At this time, Darius Sullivan's firearm has jammed. Darius Sullivan is attempting to unjam his firearm using his right hand and mouth while at the same attempting to disarm Sgt. Rittmanic of her duty weapon with his left hand. During the struggle, the Defendant walks down the hotel hallway to where Darius Sullivan and Sgt. Rittmanic are struggling. Sullivan tells the Defendant to "cock the gun, cock the gun" referring to his jammed firearm. The Defendant reaches around the waist of Sullivan – who at the time is still struggling with Sgt. Rittmanic – and assists Sullivan in his attempt to cock the firearm and/or disarm Sgt. Rittmanic. As a result of the Defendant's assistance, Darius Sullivan is able to disarm Sgt. Rittmanic.

Once the Defendant and Sullivan had disarmed Sgt. Rittmanic, they stood over Sgt. Rittmanic as she lay on the floor, already having been shot once. The Defendant stood over Sgt. Rittmanic while holding Sullivan's 9mm and/or the drum clip. Sullivan then told the Defendant to "give me the keys". As the Defendant went to hand the keys to Darius Sullivan, Darius Sullivan fired two shots from what we believe was Sgt. Rittmanic's duty weapon, striking Sgt. Rittmanic in or about the throat and/or neck. At this time the Defendant handed the keys to Sullivan and told him "you have to go."

At the time Sullivan fired the fatal shots into Sgt. Rittmanic, Sgt. Rittmanic was pleading with them to just leave, you don't have to do this, please just go, please don't, please don't, she was desperately pleading for her life.

Sullivan fled down the stairwell of the hotel and left in a vehicle. The Defendant then retreated to the hotel room, gathered up her belongings and two children who were in the room at the time, and fled the hotel separate from the Defendant.

Both officers were in full police uniform at the time of this offense. Sgt. Rittmanic succumbed from the gunshot wounds later that evening; Officer Bailey remains hospitalized and fighting for his life.

This Defendant actively assisted and enabled Darius Sullivan throughout the course of the murder of Sgt. Rittmanic and attempt murder of Officer Bailey, and she is equally responsible.

Darius Sullivan is in custody in Indiana where we are awaiting a Governor's Warrant to extradite him to our jurisdiction. He too has been charged with multiple counts of First Degree Murder.

I have already filed a notice of intent to seek life sentences in both cases.

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