



CITY OF FORT WAYNE

SHARON TUCKER, MAYOR

NOTICE OF VIOLATION

June 10, 2026

Shore Behavioral LLC
ATTN: Highest Ranking Executive Officer
CT Corporation System
334 North Senate Avenue
Indianapolis, IN 46204

Shore Behavioral LLC
ATTN: Legal Department
10123 Alliance Road, Suite 320
Blue Ash, Ohio, 45245

RE: Violation of Transient Individual Relocation City Code 104

To Whom It May Concern,

This letter serves as formal notice that the City of Fort Wayne has determined that Ethan's Crossing, Indiana, violated Fort Wayne City Code Chapter 104, which prohibits the relocation of transient individuals into the City of Fort Wayne by outside organizations.

On June 3, 2026, Fort Wayne Police Department ("FWPD") Officer Spencer Wyatt ("Officer Wyatt") responded to the W. Paul Wolf Rescue Mission ("Rescue Mission") in Fort Wayne, Indiana. Upon arrival, Officer Wyatt spoke with Alexander Bear ("Bear"), security officer for the Rescue Mission. Bear provided documentation given to Helton by Ethan's Crossing indicating that Anthem Transportation had been utilized to relocate him 130 miles to Fort Wayne.

Officer Wyatt then interviewed Helton directly, confirming that he had been transported to Fort Wayne by Ethan Crossing, and that Ethan Crossing provided the transportation arrangements and all relocation details and he previously lived in Indianapolis and areas south of it, including with his sister in Nineveh, Indiana.

Helton further presented a valid Indiana identification card listing his address as 4968 Lambert Hill Ln., Nineveh, IN 46164, confirming his residence outside the City of Fort Wayne prior to being transported.

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Transporting Helton to Fort Wayne constitutes a direct violation of Fort Wayne City Code § 104, which governs the relocation of transient homeless individuals into the City of Fort Wayne.

Under City Code § 104, it is unlawful to transport or cause the transport of a homeless individual into Fort Wayne unless one of five narrowly defined exceptions applies. One such exception requires that the individual be transported directly to a homeless shelter or service provider that has agreed in advance to accept them.

The Rescue Mission was not contacted, did not consent, and did not agree to receive Helton. As a result, this transport does not fall under any of the permitted exceptions outlined in § 104.03(A). The ordinance was enacted specifically to prevent uncoordinated drop-offs of homeless individuals from outside jurisdictions - conduct that places vulnerable individuals at risk and shifts the burden of care onto local providers without any opportunity for preparation, assessment, or safety planning.

Violations of this ordinance carry a civil penalty of \$2,500 per offense, underscoring the seriousness with which the City of Fort Wayne views unauthorized relocation of homeless individuals into its jurisdiction.

Requested Actions

To prevent future violations and ensure compliance with Fort Wayne City Code, we respectfully request:

- The name and position of the individual(s) responsible for directing Helton's transport;
- Copies of any policies or procedures governing your organization's relocation of clients;
- Any documentation related to transport or the decision to send Helton to Fort Wayne.

At this time, we also request that you preserve all records relating to this matter, transportation arrangements, internal communications, and any documentation provided to or received from Helton.

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We look forward to your prompt response.

Malak B. Heiny
City Attorney
City of Fort Wayne
200 East Berry Street, Suite 430
Fort Wayne, Indiana 46802
P: 260-427-2339 F: 260-427-5678
Malak.Heiny@cityoffortwayne.org

CC: Mayor Sharon Tucker; Fort Wayne Police Chief PJ Smith; Andrew Downs, Chief of Staff

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