

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT INDEPENDENCE**

<b>POLICE NO. :</b>	20-048210
<b>PROSECUTOR NO. :</b>	095460117
<b>OCN:</b>	qo003752

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>KOREY C MATLOCK</b>	)	
<b>8913 Willow</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64123</b>	)	<b>DIVISION</b>
<b>DOB: 11/01/2001</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted  
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-  
003Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, SirJohn R Harris was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about July 27, 2020, in the County of Jackson, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Armed Criminal Action (571.015-001Y19755213.0)**

## **State vs. Korey C Matlock**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Robbery in First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

### **Count III. Attempted Robbery - 1st Degree (570.023-001Y20171204.1)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Sections 562.012, and 558.011, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri the defendant acted with others armed with deadly weapons to forcibly take purported marijuana from two individuals, and such conduct was a substantial step toward the commission of the offense of robbery in the first degree, and was done for the purpose of committing such robbery in the first degree.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

### **Count IV. Armed Criminal Action (571.015-001Y19755213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of

**State vs. Korey C Matlock**

Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Michael J. Hunt*  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

1. PO Nick Dorman, 223 N. Memorial Drive, Independence, MO 64050
  2. SirJohn R Harris, 14658 E. 95th St, Kansas City, MO 64123
  3. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050
  4. [REDACTED]
- [REDACTED]
- [REDACTED]

## PROBABLE CAUSE STATEMENT

Date: 7/28/2020

Report #: 2020-48210

I, Roger Lane, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 7/27/2020, at 0109 hours, Korey C. Matlock, (Race- Black, Sex- Male, DOB- 11/01/2001, Address-9813 Willow, Kansas City, Missouri, 64123, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 7/27/2020 at 0109 hours, Korey C. Matlock; Herein referred to as the Defendant, did knowingly and willfully participate in a drug transaction that resulted in the shooting death of one of the involved subjects at 12333 E. US 40 Hwy, Independence, Missouri. The business is Seven Eleven convenience store.

Independence, Missouri Police Officer Nicholas Dorman will testify that he responded to the Seven Eleven located at 12333 E. US 40 Hwy on a reported shooting. Independence, MO police dispatch received several phone calls regarding the incident. One of the calling parties told police dispatch that there was an unknown subject wearing a white shirt and red pants lying on the ground in the parking lot of the business. When Officer Dorman arrived at the scene, he observed a gold 2 door Pontiac Grand Am parked on the east side of the business; unoccupied with the engine on and passenger door open. Officer Dorman approached the vehicle and as he walked by to the north, he observed broken glass on the ground and a younger black male lying on the ground near the trash dumpster who was not breathing. The male was later pronounced deceased and identified as SirJohn Harris.

Officers reviewed the surveillance video from the business. The video shows a white Pontiac Grand Am arrive and back into the parking spot closest to the businesses trash dumpster. The vehicle sits there for awhile when a gold Pontiac Grand Am arrives and backs into a parking spot two spots to the east. The driver of the gold Pontiac exits the vehicle and walks to the rear of the white Pontiac and is met by one of the occupants of the white car; later identified as the Sean Matlock. The two appear to have a discussion when SirJohn Harris exits the passenger side of the white Pontiac and approaches the two. As SirJohn Harris approached the driver of the gold Pontiac, the Sean Matlock begins to walk towards the Seven Eleven building and circles around the driver of the gold Pontiac. Sean Matlock then produces a handgun and points it at the driver of the gold Pontiac in what appears to be a robbery. The Defendant then opens the driver door of the white Pontiac, produces a handgun and approaches the passenger side of the gold Pontiac. (There was a passenger in the gold Pontiac) When this happens, the driver of the gold Pontiac pulls out a handgun from his person and begins to fire at the subjects from the white Pontiac. The driver of the gold Pontiac fires several rounds towards the Defendant, Sean Matlock, K.M. and SirJohn Harris. The Defendant and Sean also fire several rounds towards the driver of the gold Pontiac. The video shows the passenger of the gold Pontiac running to the rear of the building, followed by the driver of the gold Pontiac. The Defendant, Sean and K.M. walk back to the white Pontiac and locate SirJohn Harris near the passenger side of the white Pontiac. They then leave the scene without SirJohn, leaving him on the ground with gunshot wounds.

Through Detectives investigation, it was learned that Sean, the Defendant, K.M. and SirJohn Harris had responded to the Seven Eleven to purchase marijuana. Detectives with the Independence, Missouri Police Department conducted an interview with Justin Singleton. It was learned through the investigation that Justin had took possession of one of the handguns that was used during the incident and later disposed of it. Justin was questioned about the whereabouts of the gun and led Detectives with the Independence, Missouri Police Department to a location in Prairie Village, Kansas. The gun was recovered and transported to Independence, Missouri Police Department.

Justin told Detectives that he was present at the residence of 9813 Willow in Kansas City, MO prior to the incident. Justin told Detectives that SirJohn was communicating with an unknown female who was the “middle” man in the transaction. Justin stated that while at the address on Willow, he overheard the conversation between SirJohn and the female discussing that the dealer had 7 packages left. (Referring to marijuana) The Defendant told SirJohn that he wanted “three” referring to packages of marijuana. At that time, Sean Matlock came out of the other room and told SirJohn that he wanted at least two. When the female told SirJohn that the drug dealer only had seven packages left and that he was going to have his young kid with him, The Defendant stated he wanted all of it and talked about “hittin an L”, referring to robbing the dealer. The Defendant stated that “we gonna “L” this dude for seven packages and everything in his pockets”. When Detectives asked Justin to clarify what he meant by “L”, he told Detectives that it meant to “lick” or “lash” referring to robbing people. Sean Matlock and the Defendant then discussed how they were going to divide up the packages once they were in their possession. Justin stated that during the conversation with the unknown female, they all expected the dealer to come alone with a young child. Justin stated that when SirJohn got off the phone with the unknown female, The Defendant stated that “if his kid with him, I want all seven”, referring to all seven packages of marijuana. The group then discussed how the “L” was going to go down; they sent a picture of one hundred dollars to the unknown female because the dealer wanted to know that they had money. Justin went on to tell Detectives that the Defendant and Sean Matlock rarely purchase marijuana and usually steal their marijuana. Prior to leaving the residence to go to the Seven Eleven, SirJohn Harris asked to borrow a Hi-Point handgun from Kelton Washington. Justin stated that Sean and the Defendant have a history of robbing drug dealers and have done it two other times that he is aware of. When asked where the robberies occurred, he stated at Sean and the Defendant’s apartment complex in Kansas City, Missouri.

Justin stated that after a while, he received a phone call from the The Defendant telling him that SirJohn is dead and that as they were pulling back into the 9813 Willow apartment complex, The Defendant exited the white Pontiac and tossed him a white towel with a Hi-Point handgun wrapped in it. Justin stated that he then responded to the scene of the incident with Kelton Washington. Justin stated that after leaving the scene and going home, he received a phone call from Kelton Washington telling him to “get rid of” the Hi-Point handgun. Justin admitted to placing the handgun behind a trash dumpster by a doctor’s office in Prairie Village, Kansas.

Detectives interview the Defendant, Sean Matlock and K.M. who all admitted to responding to the Seven Eleven with the intention of purchasing marijuana. All three denied responding to the business to commit a robbery.

Detective Roger Lane PID #1344

/S/ Roger Lane

---

Print Name

---

Signature

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT INDEPENDENCE**

<b>POLICE NO. :</b>	20-048210
<b>PROSECUTOR NO. :</b>	095460118
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>SEAN M MATLOCK</b>	)	
<b>9813 Willow</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64123</b>	)	<b>DIVISION</b>
<b>DOB: 02/05/2000</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted  
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-  
003Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, SirJohn R Harris was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about July 27, 2020, in the County of Jackson, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**State vs. Sean M Matlock**

**Count II. Armed Criminal Action (571.015-001Y19755213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference,

and the defendant committed the foregoing felony of Attempted Robbery in First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

**Count III. Attempted Robbery - 1st Degree (570.023-001Y20171204.1)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Sections 562.012, and 558.011, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri the defendant acted with others armed with deadly weapons to forcibly take purported marijuana from two individuals, and such conduct was a substantial step toward the commission of the offense of robbery in the first degree, and was done for the purpose of committing such robbery in the first degree.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

**Count IV. Armed Criminal Action (571.015-001Y19755213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about July 27, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference,

and the defendant committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

**State vs. Sean M Matlock**

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Michael J. Hunt*  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

1. PO Nick Dorman, 223 N. Memorial Drive, Independence, MO 64050
2. SirJohn R Harris, 14658 E. 95th St, Kansas City, MO 64123
3. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050
4. [REDACTED]

■ [REDACTED]

■ [REDACTED]

## PROBABLE CAUSE STATEMENT

Date: 7/28/2020

Report #: 2020-48210

I, Roger Lane, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 7/27/2020, at 0109 hours, Sean M. Matlock, (Race- Black, Sex- Male, DOB- 02/05/2000, Address-9813 Willow, Kansas City, Missouri, 64123, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 7/27/2020 at 0109 hours, Sean M. Matlock; Herein referred to as the Defendant, did knowingly and willfully participate in a drug transaction that resulted in the shooting death of one of the involved subjects at 12333 E. US 40 Hwy, Independence, Missouri. The business is Seven Eleven convenience store.

Independence, Missouri Police Officer Nicholas Dorman will testify that he responded to the Seven Eleven located at 12333 E. US 40 Hwy on a reported shooting. Independence, MO police dispatch received several phone calls regarding the incident. One of the calling parties told police dispatch that there was an unknown subject wearing a white shirt and red pants lying on the ground in the parking lot of the business. When Officer Dorman arrived at the scene, he observed a gold 2 door Pontiac Grand Am parked on the east side of the business; unoccupied with the engine on and passenger door open. Officer Dorman approached the vehicle and as he walked by to the north, he observed broken glass on the ground and a younger black male lying on the ground near the trash dumpster who was not breathing. The male was later pronounced deceased and identified as SirJohn Harris.

Officers reviewed the surveillance video from the business. The video shows a white Pontiac Grand Am arrive and back into the parking spot closest to the businesses trash dumpster. The vehicle sits there for awhile when a gold Pontiac Grand Am arrives and backs into a parking spot two spots to the east. The driver of the gold Pontiac exits the vehicle and walks to the rear of the white Pontiac and is met by one of the occupants of the white car; later identified as the Defendant. The two appear to have a discussion when SirJohn Harris exits the passenger side of the white Pontiac and approaches the two. As SirJohn Harris approached the driver of the gold Pontiac, the Defendant begins to walk towards the Seven Eleven building and circles around the driver of the gold Pontiac. The Defendant then produces a handgun and points it at the driver of the gold Pontiac in what appears to be a robbery. Corey Matlock then opens the driver door of the white Pontiac, produces a handgun and approaches the passenger side of the gold Pontiac. (There was a passenger in the gold Pontiac) When this happens, the driver of the gold Pontiac pulls out a handgun from his person and begins to fire at the subjects from the white Pontiac. The driver of the gold Pontiac fires several rounds towards the Defendant, Corey Matlock, K.M. and SirJohn Harris. The Defendant and Corey also fire several rounds towards the driver of the gold Pontiac. The video shows the passenger of the gold Pontiac running to the rear of the building, followed by the driver of the gold Pontiac. The Defendant, Corey and K.M. walk back to the white Pontiac and locate SirJohn Harris near the passenger side of the white Pontiac. They then leave the scene without SirJohn, leaving him on the ground with gunshot wounds.

Through Detectives investigation, it was learned that Corey, the Defendant, K.M. and SirJohn Harris had responded to the Seven Eleven to purchase marijuana. Detectives with the Independence, Missouri Police Department conducted an interview with Justin Singleton. It was learned through the investigation that Justin had took possession of one of the handguns that was used during the incident and later disposed of it. Justin was questioned about the whereabouts of the gun and led Detectives with the Independence, Missouri Police Department to a location in Prairie Village, Kansas. The gun was recovered and transported to Independence, Missouri Police Department. Justin told Detectives that he was present at the residence of 9813 Willow in

Kansas City, MO prior to the incident. Justin told Detectives that SirJohn was communicating with an unknown female who was the “middle” man in the transaction. Justin stated that while at the address on Willow, he overheard the conversation between SirJohn and the female discussing that the dealer had 7 packages left. (Referring to marijuana) Korey Matlock told SirJohn that he wanted “three” referring to packages of marijuana. At that time, the Defendant came out of the other room and told SirJohn that he wanted at least two. When the female told SirJohn that the drug dealer only had seven packages left and that he was going to have his young kid with him, Korey Matlock stated he wanted all of it and talked about “hittin an L”, referring to robbing the dealer. Korey Matlock stated that “we gonna “L” this dude for seven packages and everything in his pockets”. When Detectives asked Justin to clarify what he meant by “L”, he told Detectives that it meant to “lick” or “lash” referring to robbing people. Korey Matlock and the Defendant then discussed how they were going to divide up the packages once they were in their possession. Justin stated that during the conversation with the unknown female, they all expected the dealer to come alone with a young child. Justin stated that when SirJohn got off the phone with the unknown female, Korey Matlock stated that “if his kid with him, I want all seven”, referring to all seven packages of marijuana. The group then discussed how the “L” was going to go down; they sent a picture of one hundred dollars to the unknown female because the dealer wanted to know that they had money. Justin went on to tell Detectives that the Defendant and Korey Matlock rarely purchase marijuana and usually steal their marijuana. Prior to leaving the residence to go to the Seven Eleven, SirJohn Harris asked to borrow a Hi-Point handgun from Kelton Washington. Justin stated that Korey and the Defendant have a history of robbing drug dealers and have done it two other times that he is aware of. When asked where the robberies occurred, he stated at Korey and the Defendant’s apartment complex in Kansas City, Missouri.

Justin stated that after a while, he received a phone call from the Korey Matlock telling him that SirJohn is dead and that as they were pulling back into the 9813 Willow apartment complex, Korey Matlock exited the white Pontiac and tossed him a white towel with a Hi-Point handgun wrapped in it. Justin stated that he then responded to the scene of the incident with Kelton Washington. Justin stated that after leaving the scene and going home, he received a phone call from the Kelton Washington telling him to “get rid of” the Hi-Point handgun. Justin admitted to placing the handgun behind a trash dumpster by a doctor’s office in Prairie Village, Kansas.

Detectives interview the Defendant, Korey Matlock and K.M. who all admitted to responding to the Seven Eleven with the intention of purchasing marijuana. All three initially denied responding to the business to commit a robbery.

Independence, Missouri Police Detective Roger Lane issued a ‘person of interest’ for the Defendant upon his release from the hospital. Once in custody an interview was conducted. The Defendant eventually told Detectives that SirJohn was facilitating the deal through a female. SirJohn told the Defendant that the deal was for “\$215 but he wasn’t gonna get the \$215”. The Defendant told Detectives that SirJohn was going to give him a “look” when they were going to steal the “cookie” packets. (Marijuana) When SirJohn exited the vehicle and looked at the marijuana, he looked at the Defendant and nodded. The Defendant stated that he then produced a handgun and pointed it at the driver/dealer of the gold Pontiac. The Defendant stated that the dealer then produced a handgun and began to fire towards him and SirJohn. The Defendant admitted to firing his weapon twice before the gun “jammed” as he fled on foot. The Defendant stated that he was hit multiple times with bullets and when he, Korey and K.M. ran back to the white Pontiac, the discovered SirJohn lying on the ground between the white Pontiac and the trash dumpster. The Defendant stated that he observed SirJohn shot in the face holding two of the “cookie” packets and he appeared to be deceased. The Defendant stated that he reached down and grabbed the two “cookie” packets and then left in the white Pontiac with Korey and K.M. He told Detectives that they drove back to his apartment at 9813 Willow in Kansas City where they passed a Hi-Point handgun off to Kelton Washington and Justin Singleton. The Defendant stated that he then responded to Research Hospital after switching vehicles to be treated for his gunshot wounds.

Detective Roger Lane PID #1344

/S/ Roger Lane

---

Print Name

---

Signature