IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY

POLICE NO.	: KC20062834
PROSECUTOR NO.	: 095462309
OCN	HR011031
STATE OF MISSOURI,)
· · · · · · · · · · · · · · · · · · ·	AINTIFF,)
vs.)
)
NICOLAS SALDANA-DAMIAN)
504 Van Brunt Blvd) CASE NO. 2016-CR
Kansas City, MO 64124) DIVISION
DOB: 12/10/1994)
Race/Sex: H/M)
)
DEFE	ENDANT.)

COMPLAINT WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 between September 5, 2020 and September 14, 2020, in the County of Jackson, State of Missouri, the defendant, alone or in concert with another or others, knowingly or with the purpose of causing serious physical injury to Elier Alejandro Pinon-Anchondo caused the death of Elier Alejandro Pinon-Anchondo by shooting him.

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. Nicolas Saldana-Damian

Count II. Armed Criminal Action (571.015-001Y20205213.0)

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 on or between September 5, 2020 and September 14, 2020, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of murder in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

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.

State vs. Nicolas Saldana-Damian

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/ Jamie K. Hunt

Jamie K. Hunt (#50401) Assistant Prosecuting Attorney 415 E. 12th Street Kansas City, MO 64106 jhunt@jacksongov.org

WITNESSES:

- DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106

 DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106

 12th St, Floor 11, Kansas City, MO 64106
- 8. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
- 9. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10/23/2020 CRN: 20-062834	
I, Detective Sean Patrick Martin #5733 (Name and identify law enforcement officer, or person having information as probable cause.)	
knowing that false statements on this form are punishable by law, state that the facts contained herein a	ire true.
I have probable cause to believe that on 09/05/2020, at 3615 Gregory (Address)	i
Kansas City, <u>Jackson</u> Missouri <u>Nicolas Saldana-Damian</u> (County) (Name of Offender(s))	
W/M 12/10/1994 committed one or more criminal offer (Description of Identity)	nse(s).
Homicide Armed Criminal Action Desecration of a Corpse	
On 09/14/2020, uniformed officers of the Kansas City Missouri Police Department were dispatched to 3603 Gregoregard to a dead body. Upon arrival, they contacted a witness who stated that he had been checking on a relative 3615 Gregory and located the victim. The victim was observed in a state of decomposition. The Jackson County Medical Examiner's Office ruled the victim's death as a homicide.	at
A party confirmed that the victim had last attempted contact on 09/05/2020 but had not been heard from since. Same party began asking friends and relatives if they had heard from the victim and was told that on 09/05/2020 victim went to a duplex owned by the father of "Nicolas Saldana," located at 3615 Gregory. It was reported that Sand a male named vere both at the residence when the victim was dropped off. It was further eported that drove a burgundy Nissan pickup truck.	the aldana
t was determined that on 09/07/2020, uniformed officers were dispatched in regard to a vehicle on fire in the arguegory and Askew. They located a burgundy Nissan pickup truck, engulfed in fire, parked in the yard of 3615 Great Great Conference of the vehicle's registered owner confirmed that that vehicle had been sold to	ea of gory.
The party that dropped the victim off was contacted by investigators and confirmed that both Nicolas Saldana and were at the residence when the victim was dropped off.	Ł
During the investigation was identified as was identified as was identified as was identified as Nicolas Saldana-Damian W/M 12/10/1994.	ldana
On 10/22/2020 and Saldana-Damian were taken into custody on investigative holds and booked in on investigative holds.	
On 10/23/2020 Detectives responded to Metro Patrol to conduct an interview with was advised Wiranda Rights and agreed to provide a statement. During his statement he admitted to being at the residence lost 3615 Gregory with the victim, Saldana-Damian, and a female that goes by ". Saldana-Damian told him.	cated

Page 1 of 2

PROBABLE CAUSE STATEMENT FORM

CRN 20-062834

wait outside while he and the victim went inside with ". . He stated he then heard around 6 gun shots and then Saldana-Damian had him come inside and verify that the victim was dead. Saldana-Damian told him that he shot the victim because he owed the victim around \$5,000 for drugs that he did not want to pay for. He stated he saw Saldana-Damian with a 9mm handgun and " with a long gun. stated that Saldana-Damian hid the gun in a refrigerator located at the residence before leaving. On 10/23/2020 Detectives interviewed Saldana-Damian after he was advised of his Miranda Rights and agreed to speak with Detectives. Saldana-Damian stated that he and the victim argued about drugs, and the victim had a gun. He stated they got into a fight and he took the gun from the victim, and then got into another fight and then shot the victim. He further stated that the victim had held the gun to s head and threatened him. Saldana-Damian further admitted to dragging the victim's deceased body through the house and tossing it down the basement stairs in an effort to hide the body. The facts supporting this belief are as follows: Printed Name Detective Sean Patrick Martin #5733 Signature The Court finds probable cause and directs the issuance of a warrant this _____ day of Judge Circuit Court of _____ County, State of Missouri.

Page 2 of 2

Form 50 P.D. (Rev. 9-2008)