


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

<b>POLICE NO. :</b>	21-001503
<b>PROSECUTOR NO. :</b>	095464964
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>ROBERT E. MATLOCK</b>	)	
<b>7719 Raytown Road</b>	)	<b>CASE NO. 2116-CR</b>
<b>Raytown, MO 64138</b>	)	<b>DIVISION</b>
<b>DOB: 10/16/1977</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200999.0)**

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 June 16, 2021, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Ramiro C. Jaramillo 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.

**Count II. Armed Criminal Action (571.015-001Y20205299.0)**

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 June 16, 2021, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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.

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/ Traci A. Stansell  
Traci A. Stansell (#41903)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050

**State vs. Robert E. Matlock**

(816) 881-4591  
truppstansell@jacksongov.org

**WITNESSES:**

1. PO Dustin Christina, 10000 E. 59th Street, Raytown, MO 64133
2. SGT Aaron Hixon, 10000 E. 59th Street, Raytown, MO 64133
3. PO Larry Jackson, 10000 E. 59th Street, Raytown, MO 64133
4. Ramiro C. Jaramillo, 7719 Raytown Road, Raytown, MO 64138
5. DET Brandon Jeffery, 10000 E. 59th Street, Raytown, MO 64133
6. [REDACTED]
7. CPL Frank McDevitt, 10000 E. 59th Street, Raytown, MO 64133
8. PO Jeffrey Peterman, 10000 East 59th Street, Kansas City, MO 64133
9. PO Brian Porch, 10000 E. 59th Street, Raytown, MO 64133
10. [REDACTED]
11. SGT Chris Shrout, 10000 E. 59th Street, Raytown, MO 64133

Probable Cause Statement Form

Date: 06-17-2021

Report: 21-1503

I, Detective Larry Jackson, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 06-16-2021 at 7719 Raytown Road, Raytown Missouri, 64138, Robert E. Matlock Jr., W/M, 10-16-1977, [REDACTED] committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 06-16-2021, at approximately 1450 hours, Raytown Police dispatch received an emergency call from the suspect, Robert E. Matlock Jr., advising that he was involved in an argument with his roommate, an unidentified male, who proceeded to lunge at him resulting in Mr. Matlock Jr. shooting the victim approximately two to three times.

Upon arrival, Raytown Officer Dustin Christina contacted Mr. Matlock Jr. at the west entry/exit front door to the residence and proceeded to detain him. While Officer Christina was placing Mr. Matlock Jr. into handcuffs, Mr. Matlock Jr. spontaneously uttered "I thought he was going to attack me I had to, the gun is on the bed and the evidence is on my phone." Officer Christina then proceeded into the residence and located the victim, later identified as Ramiro C. Jaramillo, in the north hallway of the residence with his back slumped up on the wall with apparent gunshot wounds to his chest and neck. Upon clearing the rest of the residence, Officer Christina did not observe any weapons on or near Ramiro. While Officer Christina was rendering aid to Ramiro, Officer Brian Porch remained with Mr. Matlock Jr. outside of the residence. While Officer Porch was standing outside with Mr. Matlock Jr., he spontaneously uttered that "his roommate, Ramiro, attacked him and that he thought he had a knife or something so he had to shoot him to protect himself." Ramiro C. Jaramillo was transported to Research Medical Center, 2316 E. Meyer Boulevard, Kansas City Missouri, 64132, where he succumbed to his injuries.

A search warrant of the residence was obtained and revealed multiple spent 9mm shell casings along the residences hallway and in the southwest bedroom. Multiple firearms were located in the southwest bedroom, on top of the bed, which were later determined to belong to Mr. Matlock Jr.

On 06-16-2021, at 2231 hours, a recorded interview was conducted with Robert E. Matlock Jr. Mr. Matlock Jr. was read his Miranda Rights, which he advised he understood and willingly signed a waiver to speak with Detectives. Mr. Matlock Jr. advised that he and Ramiro resided at the residence and that they both had rented individual rooms. Mr. Matlock Jr. stated that he and Ramiro had been involved in multiple prior arguments regarding household matters, such as dividing up the bills and cleaning the residence. Mr. Matlock Jr. advised that the day of the incident, he and Ramiro were continuously arguing over the fact that Mr. Matlock Jr. had placed locks on the kitchen door which leads to the garage and on the garage door which leads to the basement, where his medical marijuana was located. Mr. Matlock Jr. stated that at point during their argument, Ramiro was on his phone speaking with an unknown individual and Mr. Matlock Jr. overheard Ramiro state "I'm going to throw him off the balcony," which he perceived as a direct threat.

Mr. Matlock Jr. explained that at one point during the argument, he retreated to the basement while Ramiro continued to remain upstairs while still arguing with him. Mr. Matlock Jr. advised that he then proceeded back upstairs to secure his .22 firearm which was currently in his bedroom with the door locked. Mr. Matlock Jr. stated that he and Ramiro continued arguing and at one point, he proceeded to open his bedroom door and observed Ramiro to be standing by the locked kitchen door, which leads to the garage, demanding to be granted access, at which point he refused to do so. Mr. Matlock Jr. advised that Ramiro then proceeded to walk towards Mr. Matlock Jr.'s bedroom door, at which time he shut his bedroom door. Mr. Matlock Jr. stated that believing Ramiro had proceeded into his own bedroom, he proceeded to open his door and observed Ramiro to be standing at his doorway, which startled him.

Mr. Matlock Jr. advised that Ramiro then proceeded to lunge at him and attempted to knock his cellphone out of his hand, which he was using to record the arguments. Mr. Matlock Jr. stated that Ramiro then proceeded to take a step back and then placed his right hand behind his back and motioned that he was "pulling a weapon from behind his back." Mr. Matlock Jr. advised that he proceeded to draw his Taurus 9mm handgun from his left hip, using his right hand, and pointed the firearm at Ramiro stating "I'm going to shoot you dude, don't." Mr. Matlock Jr. stated that Ramiro then proceeded to move his right hand from behind his back to his side, at which time he observed Ramiro's right wrist to be bent, which he perceived as Ramiro having a gun or a knife despite not seeing Ramiro be in possession of a gun or a knife. Mr. Matlock Jr. advised that he then "grabbed his gun and started firing." Mr. Matlock Jr. stated that he believed he fired his handgun three or four times and that he closed his eyes while shooting his firearm. Mr. Matlock Jr. advised that prior to shooting Ramiro, Ramiro fell to the ground and that he remained in his room while calling 911. Mr. Matlock Jr. stated that prior to calling 911, he proceeded to secure his firearms and then walked outside of the residence.

Detectives then proceeded to obtain consent to review the video of the incident on Mr. Matlock Jr.'s cellphone. The video showed Mr. Matlock Jr. to be in his bedroom and Ramiro to be verbally arguing from an unknown location in the residence. Ramiro and Mr. Matlock Jr. were arguing over Ramiro's access to the locked garage due to him being a paying tenant on the contract. Mr. Matlock Jr. then proceeds to partially open his bedroom door, revealing Ramiro to be standing in front of Mr. Matlock Jr.'s bedroom door. In the video, Ramiro is seen holding the bedroom door open with his right hand while still arguing with Mr. Matlock Jr. Ramiro's right hand then proceeds to swipe at Mr. Matlock Jr.'s right hand which was holding his cellphone, resulting in distorting the camera's view away from Ramiro. Immediately after the camera's view being distorted, an inaudible statement is heard by Mr. Matlock Jr., and then Mr. Matlock Jr. stating "motherfucker, inaudible, shoot you, inaudible," followed by several rapid gunshots. It can then be heard someone stating "fuck," followed by Mr. Matlock Jr. stating "fuck you...damnit."

While reviewing the video with Mr. Matlock Jr., he proceeded to make the following comments. "he lunged for me, jumped back, and that's when he went like this (reached behind his back with his right hand) Im going to shoot you, boom, boom, booin, I pulled my gun and fired. I said I will have to shoot you before I pulled my gun. I don't know what he went for." Mr. Matlock Jr. stated that upon opening his bedroom door, he observed Ramiro to be approximately 8-12 inches from his door, and that Ramiro immediately lunged at him. Mr. Matlock Jr. stated "when I started firing, he was right about here, at his door (Ramiro's northeast bedroom door)." Mr. Matlock Jr. advised "after shooting him, he was on the ground, leaned up against the east wall of the hallway." Mr. Matlock Jr. stated "I didn't even know I shot that much, I thought I shot three or four times, I shot him center mass." Mr. Matlock Jr. advised that while he was firing at Ramiro, Ramiro was standing up.

An autopsy on Ramiro was performed at the Jackson County Medical Examiner's Office which revealed Ramiro had sustained multiple apparent gunshot wounds along his right side and the right quarter of his back. Personnel advised that based on the path of the bullets from the right side of his body to the left, Ramiro's right side of his body was facing Mr. Matlock Jr.

A criminal history check was conducted on Mr. Matlock Jr. which revealed him to not be a felon.

Name: Detective Larry Jackson

Signature: /s/ Det. Larry Jackson #1428